



SAN FRANCISCO PLANNING DEPARTMENT

Preliminary Mitigated Negative Declaration

Date: August 8, 2012
Case No.: 2011.0277E
Project Title: 2700-2750 Jackson Street/ Town School for Boys
Zoning: RH-2 (Residential House District, Two Family)
40-X Height and Bulk District
Block/Lot: 0978/018
Lot Size: 35,113 square feet
Project Sponsor: Mary Murphy, Gibson, Dunn & Crutcher LLP representing
Town School for Boys, (415) 393-8257
Lead Agency: San Francisco Planning Department
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PROJECT DESCRIPTION:

The proposed project would include a phased addition to the Town School for Boys of 19,460 square-feet (sf) to increase the overall size of the school from 54,540 sf to 74,000 sf. The existing building ranges in height from 37'-6" to 51' and occupies the entirety of the lot at the northwest corner of Jackson and Scott Streets. The proposed project would be constructed in two phases: the Core Modernization/Expansion Phase and the Glazing Efficiency Upgrade. The Core Modernization/Expansion Phase would include: 1) demolition and construction of a new academic core; 2) excavation for multi-purpose room and classrooms; 3) classroom modernization; and 4) restroom renovations and accessibility upgrades. This would involve excavation of a 14,492 sf area below the existing first floor to a depth of 30 feet below grade, and construction of a 3,767 sf three-story, 40-foot tall, horizontal addition at the western portion of the building, for a total increase of 18,259 sf of floor area. In addition, the height at the proposed addition would increase from 37'-6" to 40' and the proposed elevator shaft at the northeast corner of the school would reach 55'. The Glazing Efficiency Upgrade Phase would include an energy efficiency upgrade to the glazing (glass part of the window) at the east and west wings along Jackson and Scott Streets. Glazing on Jackson Street would be relocated within the footprint of the existing building to expand the classrooms. The Glazing Efficiency Upgrade Phase would result in a horizontal addition of 1,201 sf. The proposed project would not increase the current enrollment from the existing 400 students. The Core Modernization/Expansion Phase is proposed to be constructed in 2013-2014 over a 14 month period. The Glazing Efficiency Upgrade would occur as a future phase sometime between 2018 – 2021 and would be constructed over a three month period.

FINDING:

This project could not have a significant effect on the environment. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance), and 15070 (Decision to prepare a Negative Declaration), and the following reasons as documented in the Initial Evaluation (Initial Study) for the project, which is attached.

Mitigation measures are included in this project to avoid potentially significant effects. See pages 114-118.

cc: Nancy Doty, Town School for Boys, Project Sponsor
Mary Woods, Current Planner
Supervisor Farrell, District 2

Master Decision File
Northwest Quadrant Bulletin Board
Distribution List

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INITIAL STUDY

Case Number 2011.0277E – 2700-2750 Jackson Street/ Town School for Boys

Table of Contents

	<i>Page</i>
A. Project Description.....	1
B. Project Setting.....	12
C. Compatibility with Existing Zoning and Plans	12
San Francisco Planning Code	13
Other Plans and Policies	15
Required Approvals	15
D. Summary of Environmental Effects	16
E. Evaluation of Environmental Effects	16
1. Land Use and Land Use Planning	17
2. Aesthetics	19
3. Population and Housing	23
4. Cultural and Paleontological Resources	25
5. Transportation and Circulation.....	33
6. Noise	41
7. Air Quality	46
8. Greenhouse Gas Emissions.....	68
9. Wind and Shadow.....	80
10. Recreation.....	81
11. Utilities and Service Systems.....	83
12. Public Services	88
13. Biological Resources	89
14. Geology and Soils.....	92
15. Hydrology and Water Quality	97
16. Hazards and Hazardous Materials.....	103
17. Mineral and Energy Resources.....	110
18. Agriculture Resources	112
19. Mandatory Findings of Significance.....	113
F. Mitigation Measures.....	114
G. Public Notice and Comment	119
H. Determination	120
I. List of Preparers	121

List of Figures

	<i>Page</i>
Figure 1	Project Site Location..... 3
Figure 2	Proposed Roof Plan/Site Plan..... 4
Figure 3	Proposed Basement Plan..... 5
Figure 4	Proposed Second-Floor Plan..... 6
Figure 5	Proposed Third-Floor Plan 7
Figure 6	Proposed Roof Plan..... 8
Figure 7	Proposed South Elevation..... 9
Figure 8	Proposed East Elevation..... 10
Figure 9	Proposed North Elevation 11

List of Tables

Table 1	Air Quality Significance Thresholds..... 49
Table 2:	Summary of Construction Health Risk Analysis..... 63
Table 3:	Summary of Non-Cancer Health Impacts 64
Table 4:	Cumulative Health Impacts..... 67
Table 5:	GHG Reductions from the AB 32 Scoping Plan Sectors 73
Table 6:	Greenhouse Reduction Strategies Applicable to the Proposed Projects 77

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INITIAL STUDY

Case Number 2011.0277E — 2700-2750 Jackson Street/ Town School for Boys

A. PROJECT DESCRIPTION

PROJECT LOCATION AND SITE CHARACTERISTICS

The project site is located at 2700 – 2750 Jackson Street (aka Town School for Boys), on the northwest corner of Jackson and Scott Streets on a block bounded by Pacific Avenue to the north, Scott Street to the east, Jackson Street to the south, and Divisadero Street to the west, in San Francisco's Pacific Heights neighborhood (see Figure 1, Project Location Map). The 35,113-square-foot (sf) project site (Assessor's Block 0978, Lot 018) contains an approximately 54,540 sf, two to three-story school building with partial basement. The building's existing height ranges from 37'6" to 51' in the location of the legal non-conforming gym roof. The school is comprised of four interlocked buildings that were constructed in phases from 1956 to 1983. The project site contains no off-street parking and fronts on both Jackson and Scott Streets. The Town School for Boys is a K-8 school and has a current enrollment of 400 students. The project site is located in a Residential House, Two Family (RH-2) Zoning district and a 40-X Height and Bulk district.

The project site is located across Jackson and Scott Streets from Alta Plaza Park. The project site slopes up towards the northwest, and the rear yards of the neighboring properties are level with the roof-top elevation of the school. The existing school was constructed into the hillside and the north wall of the school, parallel Jackson Street and perpendicular to Scott Street, acts as a two-story retaining wall.

PROPOSED PROJECT

The proposed project would include a two phased addition to the existing school of a total of 19,460 sf to increase the overall size of the existing school from 54,540 sf to 74,000 sf. The proposed project would not increase the current enrollment from the existing 400 students. The proposed project would be constructed in two phases; the Core Modernization/Expansion Phase and the Glazing Efficiency Upgrade.

The Core Modernization/Expansion Phase would include the following primary aspects, which are described in further detail below: 1) demolition and construction of a new Academic Core; 2) excavation for the

construction of a multi-purpose room and classrooms; 3) classroom modernization; and 4) restroom renovations and restroom accessibility upgrades. The Core Modernization/Expansion Phase would construct a 14,492 sf below grade addition under the existing first floor, and a 3,767 sf three-story horizontal addition at the western portion of the building, for a total overall increase of 18,259 sf to the school. The new Academic Core would allow for the addition of a relocated literary arts room; new entry facade, lobby, central circulation and elevator; new third floor offices, physical education studio and locker room; and new roof garden with accessible elevator access/mechanical penthouse. The proposed multi-purpose room and classrooms would be excavated below the existing first floor to a depth of approximately 30 feet below grade, and would include the addition of seven new classrooms, mechanical spaces, and a multipurpose room that would contain a gym and stage, and would function as a combination of auditorium, stage and music room, and literary arts room.

The Glazing Efficiency Upgrade Phase would include an energy efficiency upgrade to the glazing at the east and west wings along Jackson and Scott Streets. Glazing on Jackson Street would be relocated within the footprint of the existing building to expand the classrooms.¹ The Glazing Efficiency Upgrade Phase would result in a horizontal addition of 1,201 sf. and would maintain the existing height at façades of the school of 40 feet.

The construction of the Core Modernization/Expansion Phase and Glazing Efficiency Upgrade Phase would result in an overall increase in 19,460 sf to the existing school. The proposed project would result in an increase in the buildings' height on certain sections of the existing school. The height at the proposed addition would increase from 37'-6" to 40' and the proposed elevator shaft at the northeast corner of the school would reach 55'. The other portions of the school building would remain at their existing height.

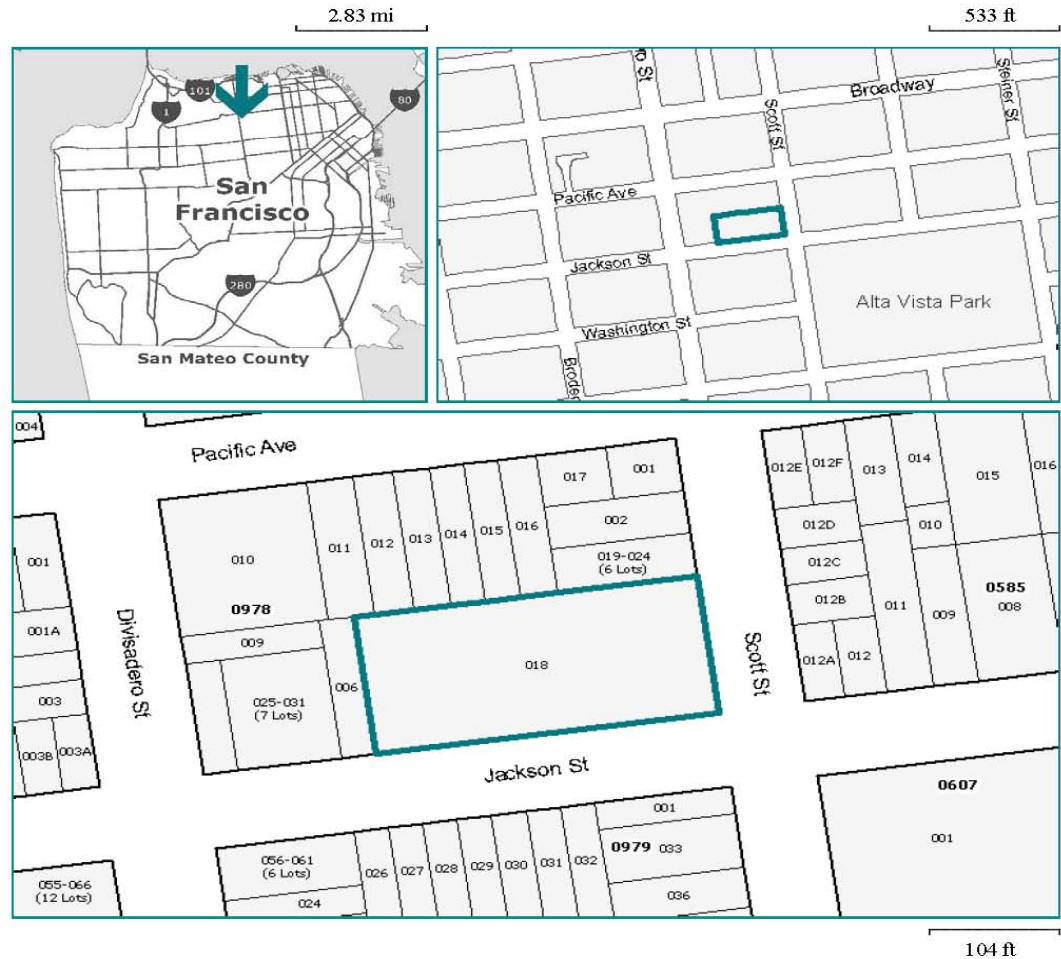
The Core Modernization/Expansion Phase would occur in 2013-2014 and would be constructed in a period occurring over approximately 14 months. During this time some students would remain on site and some students would be relocated. The Glazing Efficiency Upgrade would occur as a future phase sometime between 2018 – 2021 and would be constructed over a three month period.

¹ The existing front setback for the school is approximately 4' from the property line to the face of the building at the 2nd and 3rd floors of Jackson Street.



CITY AND COUNTY OF SAN FRANCISCO
PLANNING DEPARTMENT

Town School for Boys



<http://cityplan-03sde/locationmap/locationmap.html>

5/17/2012

Figure 1 – Project Location
Source: Planning Department, July 2011
(not to scale)

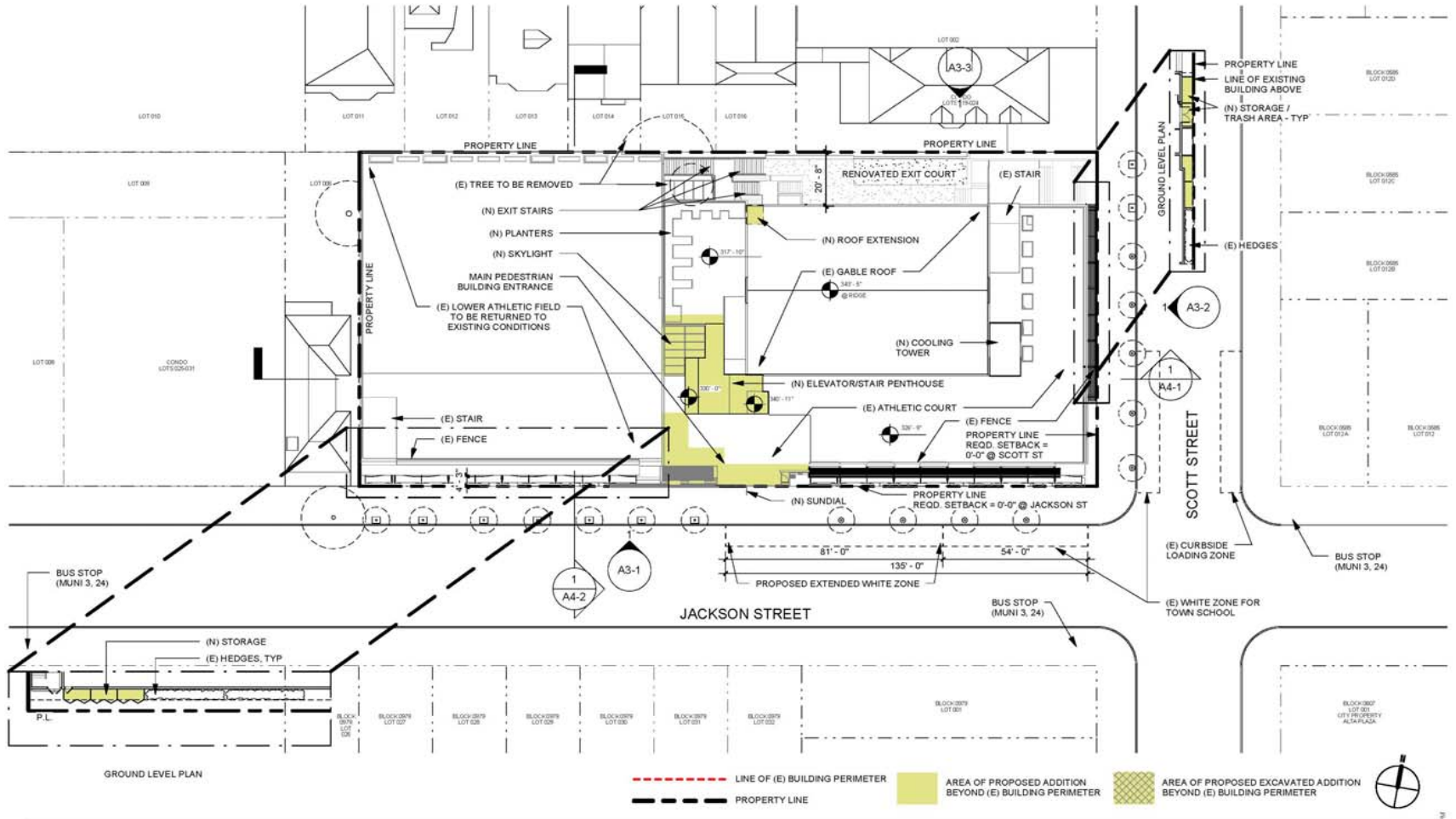


Figure 2 – Proposed Roof Plan/Site Plan
 Source: MK Think, November 2011
 (not to scale)

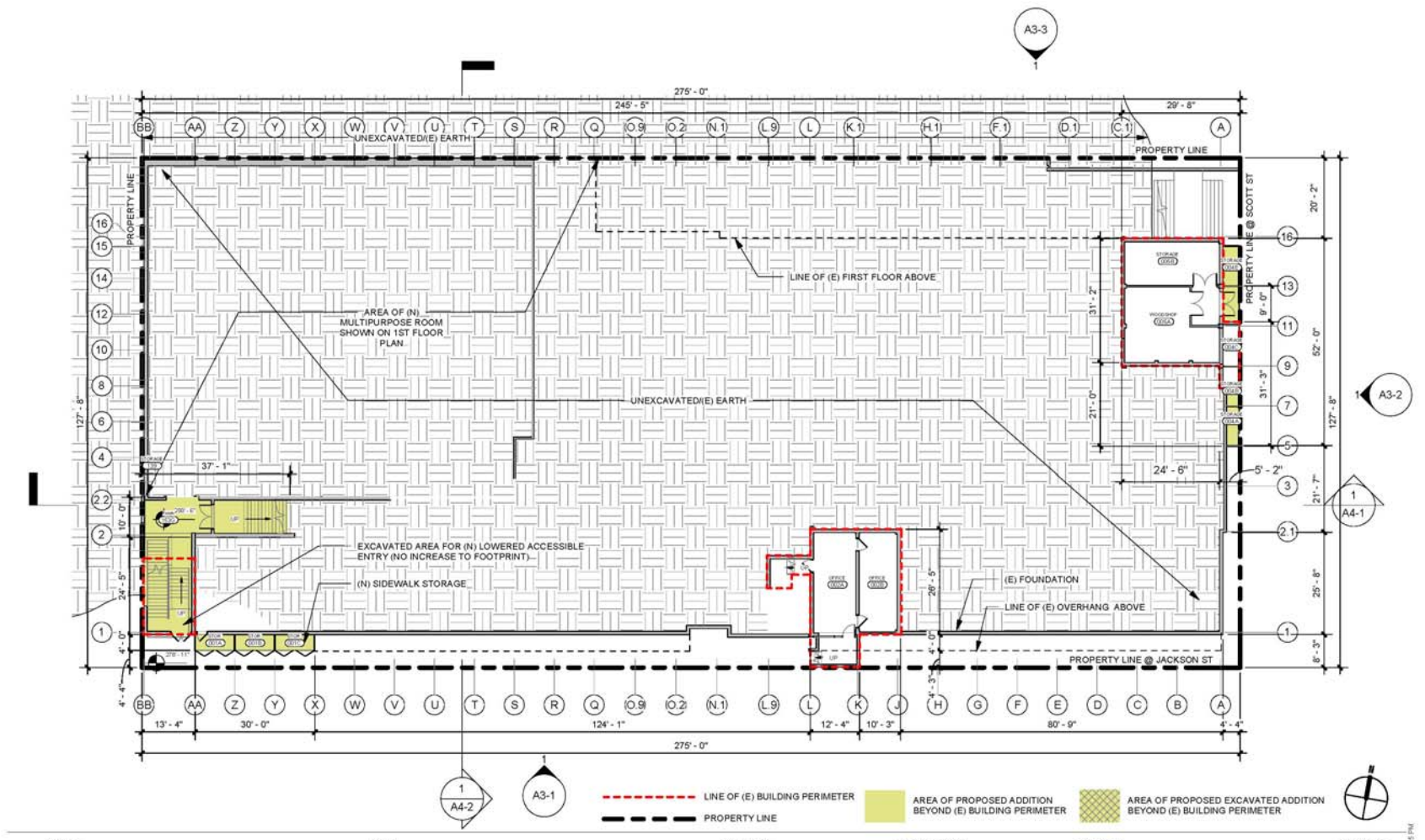


Figure 3 –Proposed Basement Plan
 Source: MK Think, November 2011
 (not to scale)

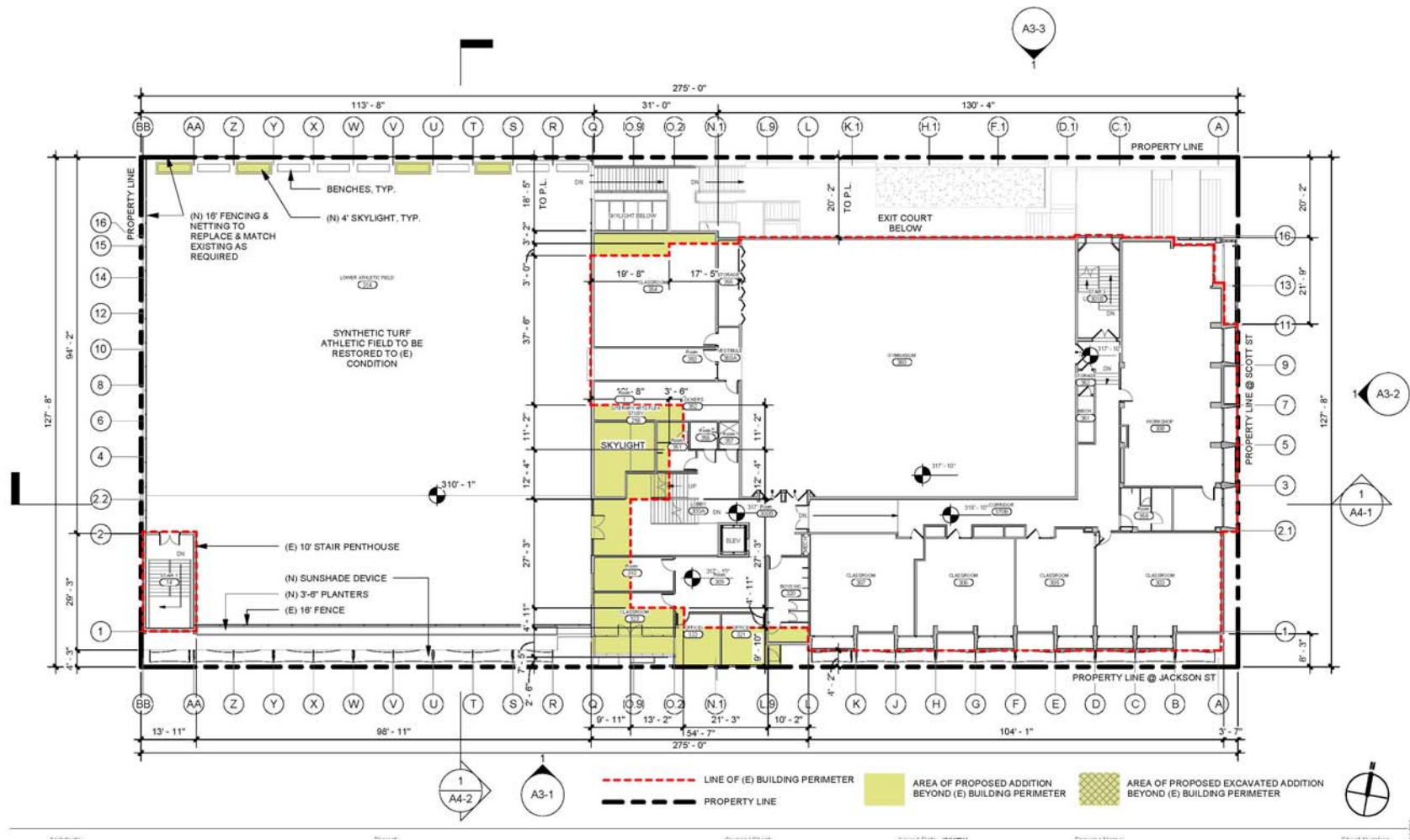


Figure 5 – Proposed Third Floor Plan
 Source: MK Think, November 2011
 (not to scale)

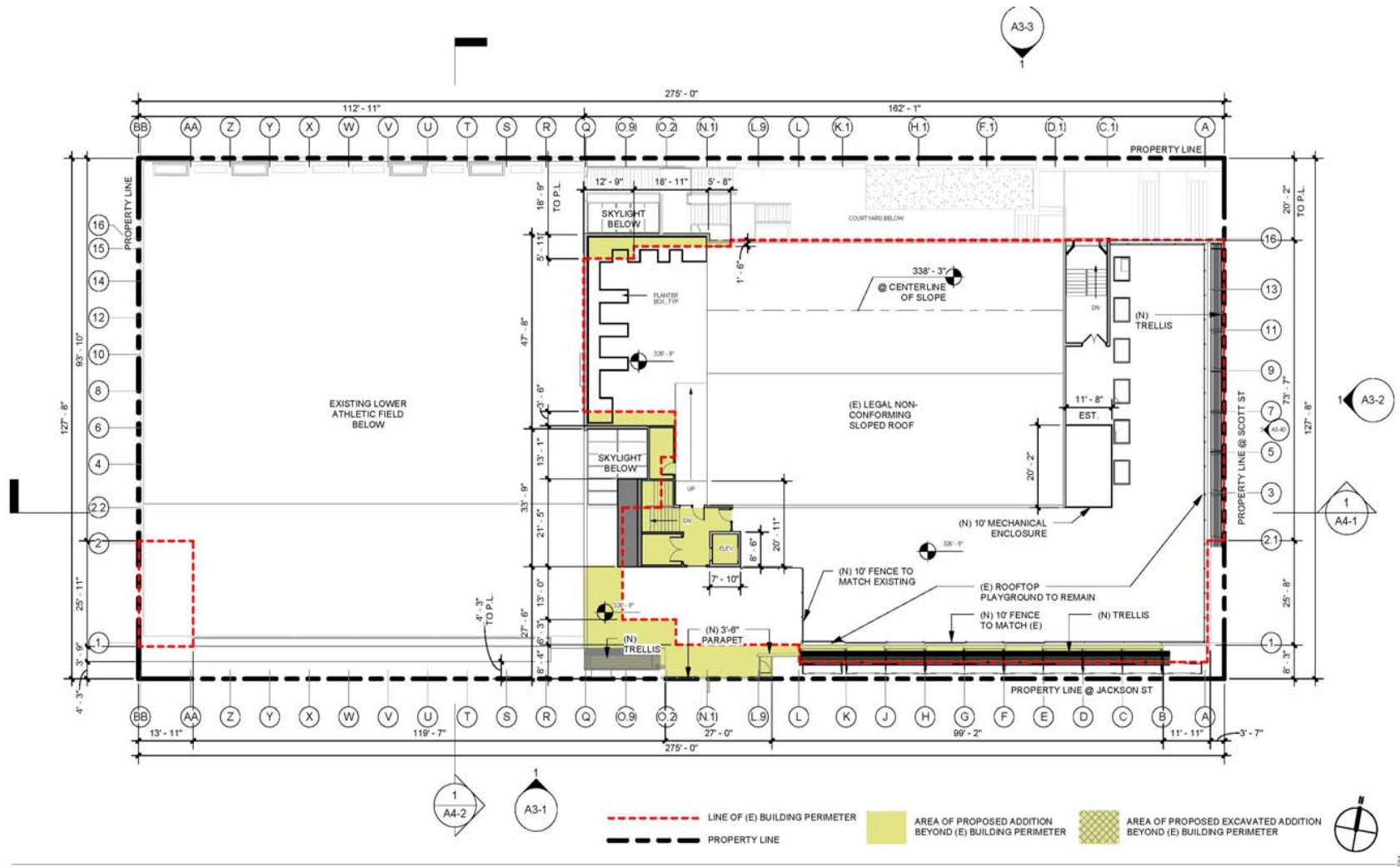


Figure 6 – Proposed Roof Plan
 Source: MK Think, November 2011
 (not to scale)

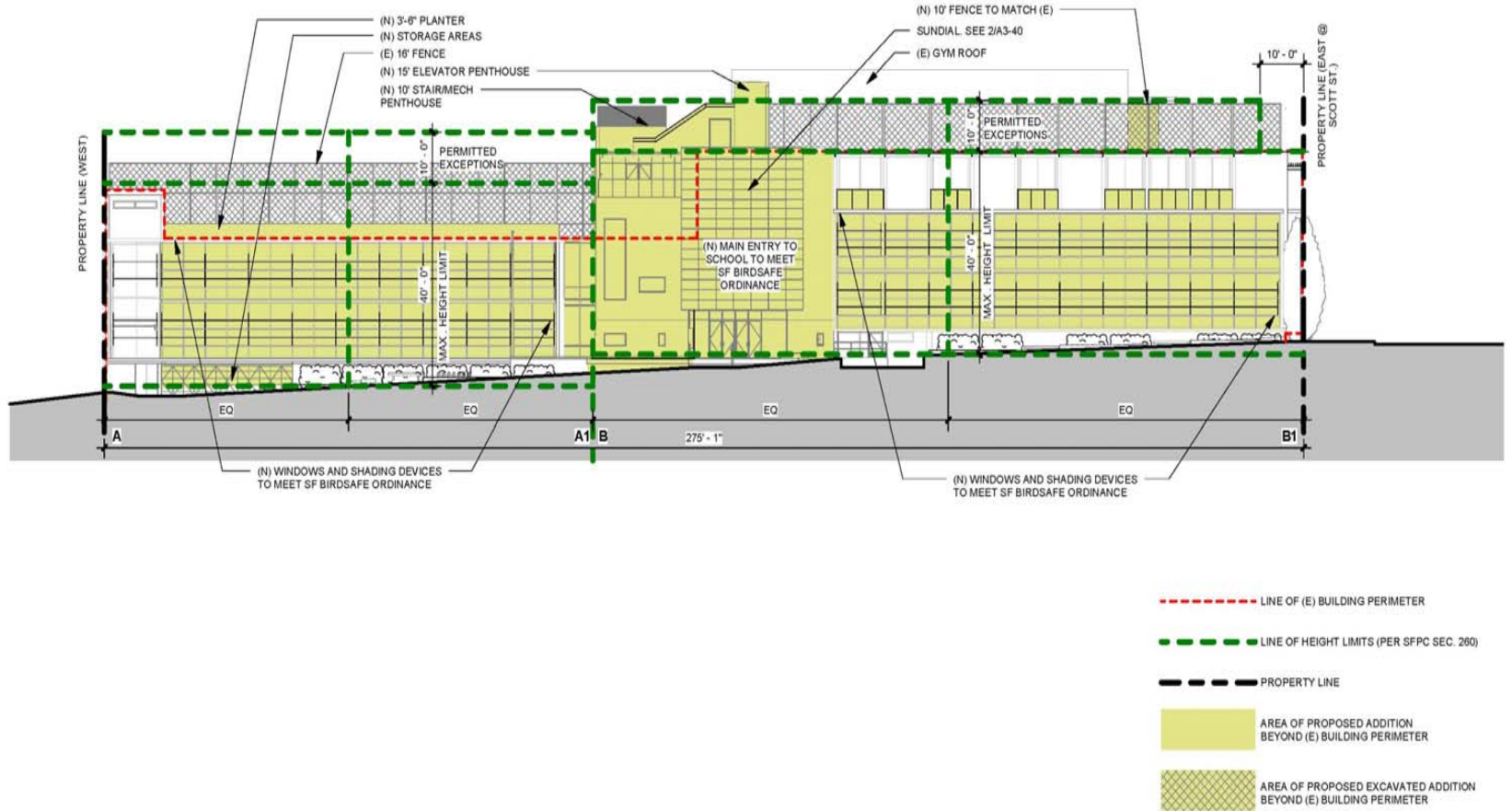


Figure 7 – Proposed South Elevation
 Source: MK Think, November 2011
 (not to scale)

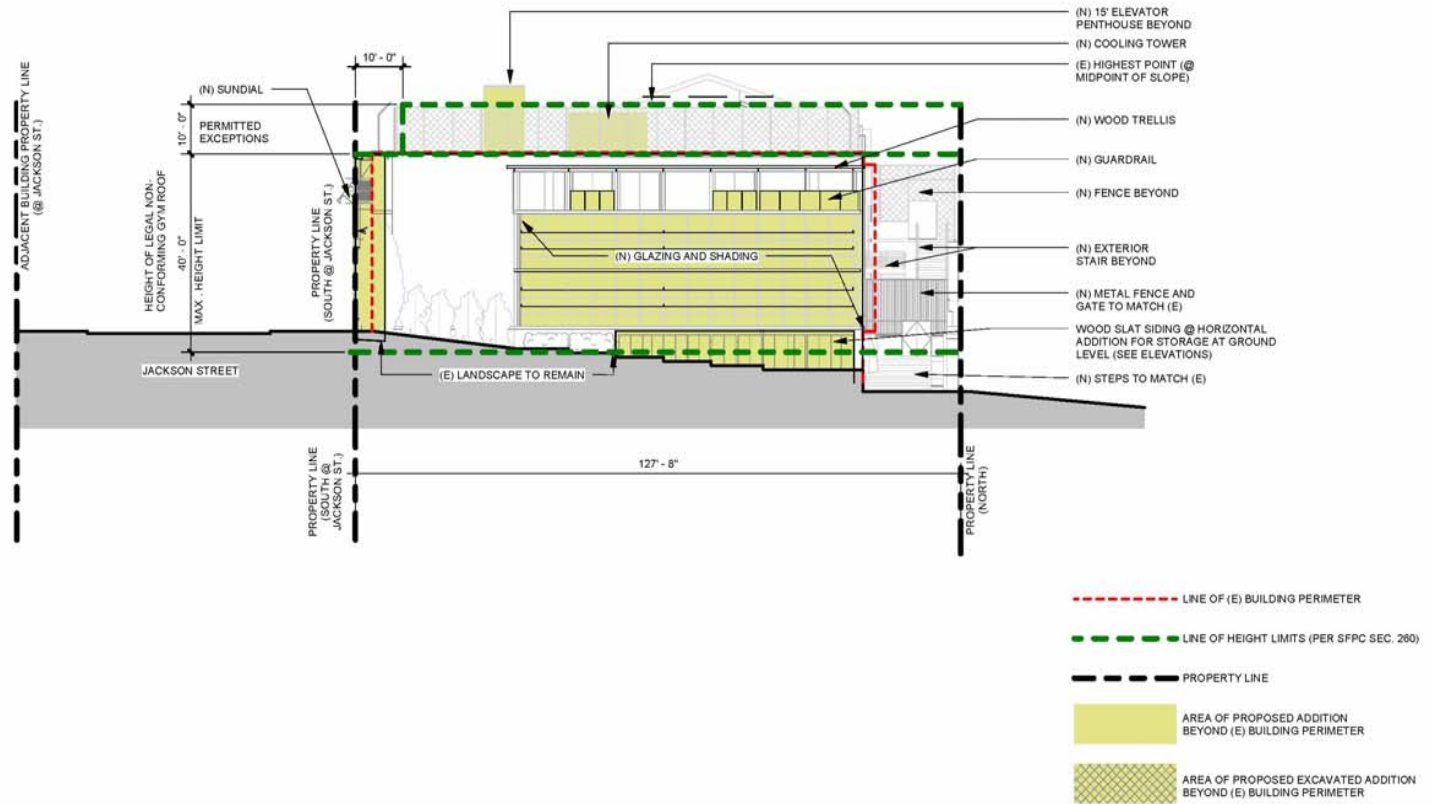


Figure 8 – Proposed East Elevation
 Source: MK Think, November 2011
 (not to scale)

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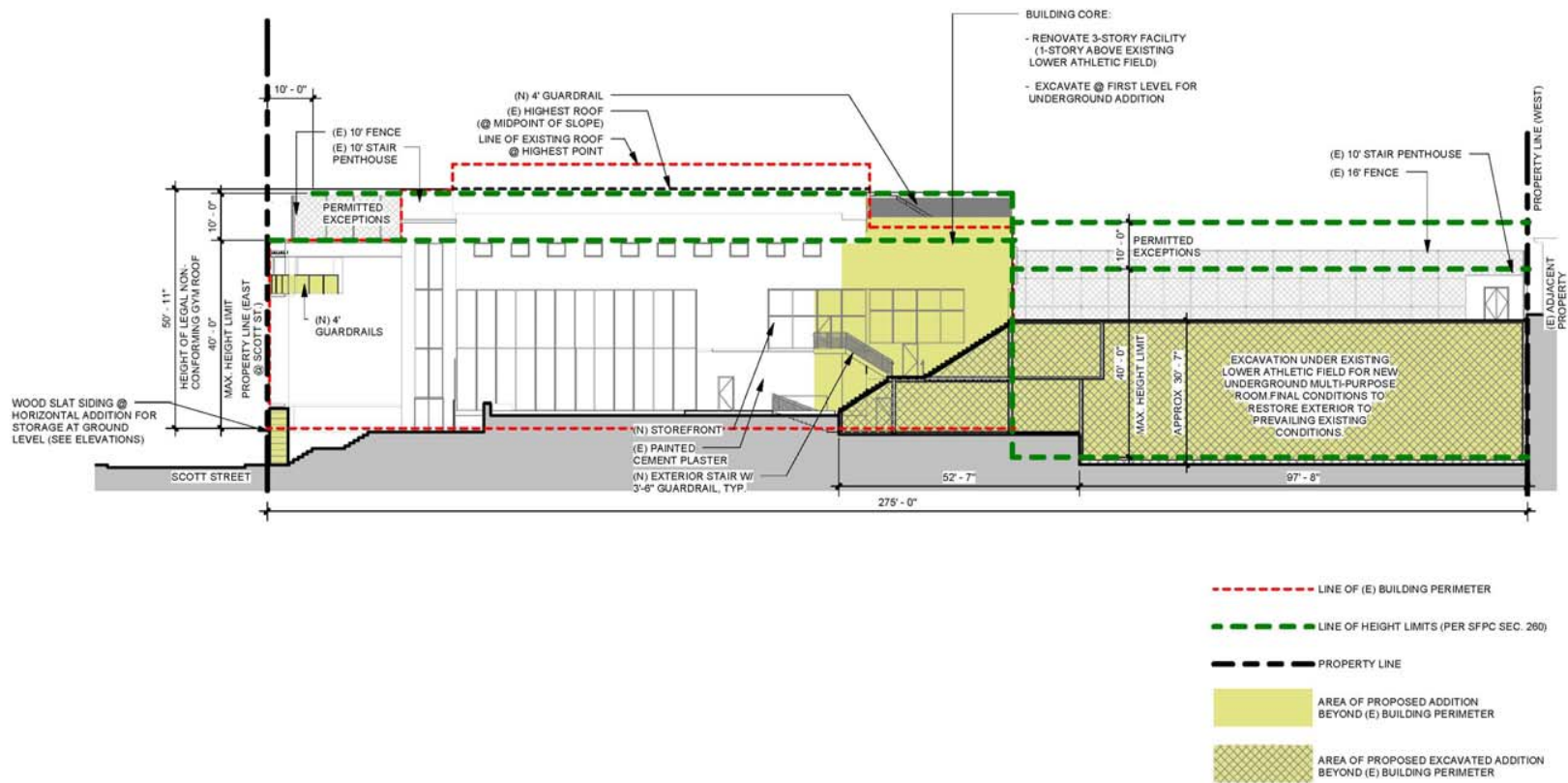


Figure 8 – Proposed North Elevation
 Source: MK Think, November 2011
 (not to scale)

B. PROJECT SETTING

The project site is located at 2700 – 2750 Jackson Street, on the northwest corner of Jackson and Scott Streets on a block bounded by Pacific Avenue to the north, Scott Street to the east, Jackson Street to the south, and Divisadero Street to the west, in San Francisco’s Pacific Heights neighborhood. Land uses in the surrounding neighborhood are primarily residential, including both single-family and multi-family residential buildings. Additionally, the Sterne School is located directly east of the project site along Jackson Street. The parcels immediately adjacent to the site include a three-story, single-family residential building to the west, a four-story, middle-school through high-school building to the east, a three-story apartment building with seven-residential units, as well as several other three-story multi-family residential units to the south. Directly behind the project site along Pacific Avenue are primarily three-story single-family homes. Alta Plaza Park is located diagonally across the street from the project site and is bordered by Scott, Jackson, Steiner, and Clay Streets.

The project site is zoned RH-2 (Residential House District, Two-Family). The RH-2 district is primarily devoted to one-family and two-family houses, with the latter commonly consisting of two large flats, one occupied by the owner and the other available for rental. Structures are finely scaled and usually do not exceed 25 feet in width or 40 feet in height. In some cases, group housing and institutions are found in these areas, although nonresidential uses tend to be limited. Beyond the project site, Jackson Street has a mixture of RH-2 (Residential House District, Two-Family), RM-1 (Residential, Mixed District, Low Density), RH-1 (Residential House District, One-Family) and P (Public) zonings. Additionally, the surrounding parcels are all in the height and bulk district 40-X.

C. COMPATIBILITY WITH EXISTING ZONING AND PLANS

	<i>Applicable</i>	<i>Not Applicable</i>
Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

SAN FRANCISCO PLANNING CODE

The *San Francisco Planning Code (Planning Code)*, which incorporates by reference the City's Zoning Maps, governs permitted uses, densities, and configuration of buildings within San Francisco. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless the proposed project conforms to the *Planning Code*, an exception is granted pursuant to provisions of the *Planning Code*, or a reclassification of the site occurs.

Use. The proposed project includes an addition to an existing school. The project site is zoned RH-2. RH-2 Districts are devoted to one-family and two-family houses. Structures are finely scaled and usually do not exceed 25 feet in width or 40 feet in height. Elementary schools, either public or private require a Conditional Use permit in RH-2 districts. The Town School for Boys received a Conditional Use permit in 1981 for a 6,000 sf addition to the existing school building. Prior to that time, the school existed as a legal nonconforming use established before a Conditional Use permit was required for elementary and secondary schools within RH-2 districts

Planned Unit Development. The proposed project would require approval of a Planned Unit Development (PUD) pursuant to *Planning Code* Section 304 for development of a site greater than one-half acre in size. A Planned Unit Development may be authorized by the Planning Commission as a conditional use, in accordance with the provisions and criteria of Section 303 of the Planning Code. Planned Unit Developments are intended for projects on sites of greater than one half-acre that would be developed with outstanding overall design, such that a project may merit modification of certain of the provisions contained in the Planning Code. A PUD shall be subject to the conditions of Section 303 and shall only be exempted from other provisions of this Code only to the extent specified in the PUD authorization. Under no circumstances shall a project be exempted from any height limit established by Article 2.5 of this Code, unless such exception is explicitly authorized by the terms of this Code.

Conditional Use. The proposed project would require a Conditional Use Authorization permit pursuant to Planning Code Sections 303 for the modification of a previously approved Conditional Use authorization and the expansion of an existing school facility.

Height and Bulk. The proposed project is within the 40-X Height and Bulk District, which permits construction to a height of 40 feet. The buildings existing height ranges from 37'6" to 51'. The

proposed project would result in a two phased addition to the existing school building which would increase the height in certain portions of the school, including a three-story, 40-foot horizontal addition at the western portion of the building, and the proposed elevator shaft at the northeast corner of the school would reach 55'. The proposed horizontal addition would be 40 feet tall to the roof and would comply with the height regulations, and the 55' foot tall rooftop elevator shaft/mechanical penthouse are exempt from height limits per *Planning Code* Section 260(1)(b). In the 40-X Height and Bulk District restrictions on bulk apply only above 40 feet. Thus, the bulk of the building would not be subject to code restrictions. Thus, the proposed project would comply with the 40-X Height and Bulk District limits.

PLANS AND POLICIES

San Francisco General Plan Priority Planning Policies

The *San Francisco General Plan (General Plan)*, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The compatibility of the project with *General Plan* policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project and any potential conflicts identified as part of that process would not alter the physical environmental effects of the proposed project.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City's *Planning Code* to establish eight Priority Policies. These policies, and the sections of this Environmental Evaluation addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Question 1c, Land Use); (3) preservation and enhancement of affordable housing (Question 3b, Population and Housing, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Questions 5a, b, f, and g, Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1c, Land Use); (6) maximization of earthquake preparedness (Questions 13 a-d, Geology, Soils, and Seismicity); (7) landmark and historic building preservation (Question 4a, Cultural Resources); and (8) protection of open space (Questions 8 a and b, Wind and Shadow, and Questions 9a and c, Recreation and Public Space). Prior to issuing a permit for any project which

requires an Initial Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action which requires a finding of consistency with the *General Plan*, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. As noted above, the consistency of the proposed project with the environmental topics associated with the Priority Policies is discussed in the Evaluation of Environmental Effects.

Other Plans and Policies

Environmental plans and policies are those, like the Bay Area Air Quality Plan, that directly address environmental issues and/or contain targets or standards, which must be met in order to preserve or improve characteristics of the City's physical environment. The proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy.

REQUIRED PROJECT APPROVALS

The proposed project would require the following approvals:

- General Plan and Proposition M consistency determination (Planning Code Section 101.1).
- Approval of a Conditional Use Application/Planned Unit Development pursuant to Planning Code Sections 303 and 304 for the modification of a previously approved Conditional Use authorization and the expansion of an existing school facility. Since the project site is greater than one-half of an acre, a Planned Unit Development may be submitted for the Conditional Use Application including any exceptions from Planning Code Sections 132, 134, 151, and 188 from front setback, off-street parking, rear yard and non-complying structure requirements.
- SFPUC Wastewater Enterprise, Urban Watershed Management Program (UWMP) – Approval of a Stormwater Control Plan and Operation and Management plan demonstrating compliance with the requirements of the Stormwater Design Guidelines (SDG) is required prior to issuance of building permits.
- Building permit by the Department of Building Inspection (DBI)
- Department of Parking and Traffic (DPT), within the Municipal Transportation Agency, approval for permits for work within the public right-of-way on Jackson Street.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially affect the environmental factor(s) checked below. The topic areas that are checked are those in which impacts that could potentially be significant unless mitigated are identified in Section E, Evaluation of Environmental Effects. The following pages present a more detailed checklist and discussion of each environmental factor.

- | | | |
|---|--|--|
| <input type="checkbox"/> Land Use | <input checked="" type="checkbox"/> Air Quality | <input type="checkbox"/> Biological Resources |
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Geology and Soils |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Wind and Shadow | <input type="checkbox"/> Hydrology and Water Quality |
| <input checked="" type="checkbox"/> Cultural and Paleo. Resources | <input type="checkbox"/> Recreation | <input checked="" type="checkbox"/> Hazards/Hazardous Materials |
| <input type="checkbox"/> Transportation and Circulation | <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Mineral/Energy Resources |
| <input checked="" type="checkbox"/> Noise | <input type="checkbox"/> Public Services | <input type="checkbox"/> Agricultural and Forest Resources |
| | | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

E. EVALUATION OF ENVIRONMENTAL EFFECTS

All items on the Initial Study Checklist that have been checked "Less Than Significant Impact," "No Impact," or "Not Applicable" indicate that, upon evaluation, staff has determined that the proposed project could not have a significant adverse environmental effect relating to that issue. For items that have been checked "Less Than Significant with Mitigation Incorporated," staff has determined that the proposed project would not have a significant adverse environmental effect provided that the project sponsor implements mitigation measures presented in Section G of this document. A discussion is included for most issues checked "Less Than Significant with Mitigation Incorporated," "Less Than Significant Impact," "No Impact," or "Not Applicable." For all of the items without discussion, the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Department, such as the Department's

Transportation Impact Analysis Guidelines for Environmental Review, or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Game. For each checklist item, the evaluation has considered the impacts of the project both individually and cumulatively.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
1. LAND USE AND LAND USE PLANNING— Would the project:					
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial impact upon the existing character of the vicinity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact LU-1: The proposed project would not physically divide an existing community. (Less than Significant)

The proposed project would result in a two phased addition of 19,460 sf to an existing school to increase the overall size of the school from 54,540 sf to 74,000 sf. The proposed project would be constructed within the existing lot boundaries of the school and would not interfere with or change the existing street plan nor impede the passage of persons or vehicles. Therefore, the proposed project would not physically divide an established community, and this impact would be less than significant.

Impact LU-2: The proposed project would be consistent with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. (Less than Significant)

Land use impacts are considered to be significant if the proposed project would conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Environmental plans and policies are those, like the Bay Area Air Quality Management Plan, which directly address environmental issues and/or contain targets or standards, which must be met in order to preserve or improve characteristics of the City’s physical environment. The proposed project would not obviously or substantially conflict with any such adopted

environmental plan or policy (see Section C. Compatibility with Existing Zoning and Plans, p. 13-15). Furthermore, the proposed project would not conflict with the San Francisco General Plan policies that relate to physical environmental issues. Therefore, the proposed project would have a less-than-significant impact with regard to consistency with existing plans, polices, and regulations.

Impact LU-3: The proposed project would not have a substantial impact upon the existing character of the project's vicinity. (Less than Significant)

Land uses in the vicinity of the site are dominated by multi-unit residential, single-family residential, high-school, and elementary schools. The proposed project would result in a two phased horizontal and below-grade addition to the existing school. Although the project would increase the size of the existing school by 19,460 sf, the project would not be substantially or demonstrably incompatible with the existing residential and school uses in the project area.

Land use impacts are considered to be significant if the proposed project would have a substantial impact upon the existing character of the vicinity. The expansion of the existing school use on the site would not be considered a significant impact because the school is an established use that would continue to operate within the neighborhood in the same manner as it does under existing conditions. Although the proposed project would result in an intensification of the existing land use, it would not introduce new or incompatible land uses to the area. As discussed in the Project Setting section, the project site is surrounded by primarily multi-family residential units, and one other school, the Sterne School. While the proposed project would intensify the use of the site compared to existing development and some buildings in the vicinity, it would not be out of character with the two- to four-story buildings that are typically found in this area. The proposed project would be developed within the existing allowable height and bulk limits of the area, and would include land uses conditionally permitted and already existing within the district.

Therefore, the proposed project's impact on the existing character of the project's vicinity would be less than significant.

Impact C-LU: The proposed project, in combination with past, present and reasonably foreseeable future projects in the vicinity of the site, would not have a substantial adverse cumulative impact to land use. (Less than Significant)

Directly north of the of the project site along Pacific Avenue is a proposed project at 2727 Pacific Avenue, which includes an interior and exterior addition to an existing three-story structure and

merger of the building from a two-unit building to a one-unit building.² Approximately 450 feet to the east of the project site is a proposed project at 2555 Divisadero Street, which includes the construction of a vertical and horizontal addition to the existing three-story residential building.³ Approximately 700 feet from the project site at 2712 Broadway project is a proposed project that would include demolition of existing single-family residence and new construction of a three-story single-family residence.⁴ There are no other reasonably foreseeable projects within one-quarter mile of the project site.

Given the nature of these projects and the distance from the project site there is no reason to expect that they would have land use impacts that could combine with the impacts of the proposed project. Further, even if these projects did have land use impacts, the proposed project would not contribute in a cumulatively considerable way to the division of an established community; conflict with plans, policies, and regulations; or change in neighborhood character. Therefore, the project would not result in any significant cumulative land use impacts.

For the reasons described above, land use impacts, both project-specific and cumulative, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
2. AESTHETICS—Would the project:					
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

² Planning Department Case No. 2012.0115E. This case is available for public review at the Planning Department, 1650 Mission Street, 4th Floor, as part of Case File no. 2012.0115E.

³ Planning Department Case No. 2011.1422E. This case is available for public review at the Planning Department, 1650 Mission Street, 4th Floor, as part of Case File no. 2011.1422.

⁴ Planning Department Case No. 2010.0158E. This case is available for public review at the Planning Department, 1650 Mission Street, 4th Floor, as part of Case File no. 2010.0158E.

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

A visual quality/aesthetics analysis is somewhat subjective and considers the project in relation to the surrounding visual character, heights and building types of surrounding uses, its potential to obstruct scenic views or vistas, and its potential for light and glare. The proposed project’s specific building design would be considered to have a significant adverse environmental effect on visual quality only if it would cause a substantial and demonstrable negative change.

Impact AE-1: The proposed project would not have a substantial adverse effect on scenic views and vistas. (Less than Significant)

A project would have a significant effect on scenic vistas if it would substantially degrade important public view corridors and obstruct scenic views from public areas viewable by a substantial number of people. View corridors are defined by physical elements such as buildings and structures that direct lines of sight and control view directions available to the public. Scenic views and vistas are limited in the project vicinity due to surrounding urban development and intervening buildings. However, there are limited views of San Francisco Bay from some portions of the project site and the surrounding vicinity, including from Alta Plaza Park, which is a public park located directly southeast of the project site.

The proposed project would result in a two phased horizontal and below-grade addition to the existing school of 19,460 sf. The below-grade portion of the addition would occur below the first floor to a depth of approximately 30-feet. The Core Modernization/Expansion Phase horizontal addition would increase the height at certain sections of the existing school including raising the height at the proposed addition from 37'-6" to 40' at the western portion of the property. Additionally, in the location of the proposed elevator shaft, the northeast corner of the school would be raised to 55'. The Glazing Efficiency Upgrade phase would maintain the existing height of 40'. These additions would not obscure any existing views of the San Francisco Bay because they

would be located below grade, at the existing height, or would involve minor increases in height to certain portions of the existing school. The proposed project could alter views from Alta Plaza Park; however, the addition would primarily be below-grade which would not disrupt any existing view. Therefore, the project would not substantially alter scenic views or degrade or obstruct any publicly accessible scenic views. The proposed project would therefore, not substantially block or degrade a public scenic view or vista.

Since the project proposes a below-grade addition and a vertical addition of 40', private views from some nearby buildings, including adjacent residential buildings, would not be substantially affected by the project. Although some reduced private views could be an unavoidable consequence of the proposed project, any change in views would not exceed that commonly accepted in an urban setting. While this loss or change of views might be of concern to those property owners or tenants, it would not affect a substantial number of people and would not rise to a level considered to be a significant impact on the environment.

The proposed project would not substantially impact any existing public views or view corridors in the area, and the adverse effect upon private views would not be considered a significant impact on the environment, pursuant to CEQA.

Impact AE-2: The proposed project would not substantially damage any scenic resources. (No Impact)

Scenic resources are the visible physical features on a landscape (e.g. land, water, vegetation, animals, structures, or other features). The project would not result in the removal of existing trees, and there are no scenic resources present on the project site or in the area that would be affected by the project.

Impact AE-3: The proposed project would not degrade the visual character or quality of the site and its surroundings. (Less than Significant)

The visual character of the project site and vicinity is an urban residential area with single and multi-family dwelling units with a diversity of building sizes and ages. The proposed project would result in a two phased horizontal and below-grade addition to the existing school. The existing building ranges in height from 37'-6" to 51' and the proposed project would raise the height of the horizontal addition from 37'6" to 40' at the western portion of the property.

Development in the area generally ranges from two- to four-story residential and educational buildings. The proposed expansion of the project site would not, in and of itself, constitute a significant impact. The existing building is considered a legally non-complying structure per the Planning Code with an existing maximum height of 51 feet in a 40-X height district. The proposed project would be within the allowable height and bulk district by constructing a horizontal addition to 40', and a 15' elevator shaft. The proposed addition would be visually compatible in terms of the types, heights, and massing of the buildings found in the immediate project vicinity.

The proposed project would increase development on the site, but would not change nor be inconsistent with the surrounding visual character of surrounding development. The proposed project would be an in-fill addition that is located in a densely developed urban area. It would not appear out of scale with other existing buildings.

The proposed project's initial design was reviewed by the Planning Department as part of the Preliminary Project Assessment (PPA). Additionally, the final architectural design and articulation would undergo further evaluation by the Planning Department through the building permit process, a process separate from the environmental review. The proposed project's final design would be available at that time.

A proposed project would have a significant adverse effect on visual quality under CEQA only if it would cause a substantial and demonstrable negative change. The proposed project would not have such a change, and its visual quality impact would be less than significant.

For all of the above reasons, the proposed project would not be expected to cause a substantial and demonstrable negative change, or disrupt the existing visual character of the project vicinity.

Impact AE-4: The proposed project would not create a new source of light and glare. (Less than Significant)

The proposed project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. The proposed project is an addition to an existing school building and would result in minimal additional sources of light or glare beyond what currently exists. The proposed project would include outdoor lighting typical of other surrounding building uses in the project vicinity. The project would not generate nighttime lighting beyond what currently exists on the project site. Because the proposed project would comply with Planning

Commission Resolution 9212, and would minimally change the amount of lighting on site, light and glare impacts would not be expected to have a substantial, demonstrable negative aesthetic impact. Based on the above analysis, the project would have a less-than-significant impact associated with light and glare.

Impact C-AE: The proposed project, in combination with past, present, and reasonably foreseeable future development in the vicinity, would not have a substantial adverse cumulative impact on aesthetic resources. (Less than Significant)

Cumulative projects are discussed on page 19. The proposed projects at 2727 Pacific Avenue and 2555 Divisadero Street are additions to multi-family and single-family homes and surrounded by a mixed scale and mixed historic structures and would be generally consistent with the buildings in the area. The proposed project at 2712 Broadway is a proposed demolition and reconstruction of a single-family home. Given the nature of these projects and the distance from the project site, it is not expected that they would have aesthetic impacts that could combine with the impacts of the proposed project. Further, even if these projects did have impacts related to aesthetics, the proposed project would not contribute in a cumulatively considerable way to substantially degrade views, damage scenic resources, or degrade the existing visual character of the area.

For the reasons discussed above, the proposed project’s impacts related to aesthetics, both individually and cumulatively, would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
3. POPULATION AND HOUSING— Would the project:					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact PH-1: The proposed project would not induce substantial population growth in San Francisco, either directly or indirectly. (No Impact)

The proposed two phased addition to the existing school building would not result in an increase in students or faculty to the Town School for Boys campus. The proposed building would be located in an urbanized area and would not substantially alter existing development patterns in the Pacific Height's neighborhood, or be expected to induce a substantial amount of growth. In view of the above, the proposed project would not induce substantial growth or displace substantial numbers of people or housing units and would therefore not have a significant adverse effect on population and housing.

Impact PH-2: The proposed project would not displace substantial numbers of people or existing housing units or create demand for additional housing, necessitating the construction of replacement housing. (No Impact)

The proposed project would not displace any residences or result in the displacement of any jobs because the project scope involves a two-phased addition to an existing school campus. The project would not result in an increase in the number of students or faculty on the campus. As discussed above, the proposed project would not induce any population growth nor have significant physical environmental effects on housing demand or population.

Impact C-PH: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not have a substantial adverse cumulative impact on population and housing. (Less than Significant)

Cumulative projects within the vicinity include 2727 Pacific Avenue, 2555 Divisadero Street, and 2712 Broadway as described on page 19. Given that the proposed project would not result in substantial growth or displace substantial numbers of people, it is not expected that the proposed project in combination with the cumulative projects would have a population and housing impact. Further, even if these projects did have population and housing impacts, the proposed project would not contribute in a cumulatively considerable way to substantial population growth or a substantial increase in housing demand. Therefore, the proposed project would not contribute to any cumulative impacts to population and housing, and impacts to population and housing, both project-specific and cumulative, would be less than significant.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
4. CULTURAL AND PALEONTOLOGICAL RESOURCES—Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco Planning Code?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact CP-1: The proposed project would not result in a substantial adverse change in the significance of historic architectural resources. (No Impact)

Historical resources are those properties that meet the terms of the definitions in Section 21084.1 of the CEQA Statute and Section 15064.5 of the CEQA Guidelines. “Historical Resources” include properties listed in, or formally determined eligible for listing in, the California Register of Historical Resources, or listed in an adopted local historic register. The term “local historic register” or “local register of historical resources” refers to a list of resources that are officially designated or recognized as historically significant by a local government pursuant to resolution or ordinance. Historical resources also include resources identified as significant in an historical resource survey meeting certain criteria. Additionally, properties which are not listed but are otherwise determined to be historically significant, based on substantial evidence, would also be considered a historical resource. The determination of whether a building may be a historical resource is associated with California Register criteria, which include events (Criterion 1), persons (Criterion 2), architecture (Criterion 3), and information potential (Criterion 4), or if it is determined to contribute to historic district or context. To be a historical resource under CEQA, a property must be shown to be not only significant under California Register criteria, but it also must retain sufficient integrity from the period of significance. A resource that is officially designated or recognized as significant on a local register of historical resources or one that is significant under the Public Resources Code, Section 5024.1(g), also is presumed to be significant under CEQA “unless the preponderance of

evidence demonstrates that the resource is not historically or culturally significant.” In a Historical Resource Evaluation Response (HRER) memorandum dated August 23, 2011, the Planning Department determined that the Town School for Boys is not a historical resource as defined by CEQA.⁵ Additionally, the HRER concluded that the building did not appear to be eligible for listing on the California Register under any of the four criteria.

The existing school was constructed over a period of time beginning in 1956 and ending in 1983. The first structure was designed by Clarence W. Mayhew and was sited at the western edge of the Jackson Street frontage. Two years later, in 1958, Mayhew designed a second structure on the site at the corner of Jackson and Scott Streets. In 1965, Mayhew designed a third structure to connect the first two buildings. Together the three structures comprised a two-story reinforced-concrete and glass building with a flat roof stepping down slightly at the westernmost structure. The building is designed in a Modern style with strong horizontal bands of aluminum-framed windows in both end structures and three vertical bays of fenestration at the joining structure where the main entry is now located. In 1971 a three-story addition designed by ROMA Architects was added at the rear (north) of the Mayhew building, filling in a large portion of the lot. Finally, in 1983, a one-story vertical addition was added at the roof of the Mayhew building. This reinforced concrete addition relates strongly to the spare, strongly horizontal lines of the original building and incorporates similar fenestration and the breeze soleil⁶ detail. The subject property is not included on any historic resource surveys or listed on any local, state or national registries. The existing buildings’ recorded date of construction (earliest construction of 1956) makes it a “Category B” building for the purposes of CEQA review. Category B buildings are considered properties requiring further consultation and review to determine whether the property is an historical resources for the purposes of CEQA.

The initial development period of the Pacific Heights neighborhood spans approximately 60 years (1850 – 1910) and is represented by a large variety of architectural styles. As a whole, this

⁵ Historic Resource Evaluation Response Memorandum for 2700 Jackson Street from Shelley Caltagirone, Preservation Planner, to Chelsea Fordham, Environmental Planning, August 23, 2011. A copy of this memorandum is available for public review at the Planning Department, 1650 Mission Street, 4th Floor, as part of Case File no. 2011.0277E.

⁶ A breeze soleil is a screen, usually louvered, placed on the outside of a building to shield the windows from direct sunlight.

prolonged and piecemeal development period does not appear to signify a singular and important event in the history of the City, although certain spurts of development within this period may be considered significant events. Furthermore, the development of 2700 Jackson Street falls outside of this initial development period. It is therefore determined that there does not appear to be a California Register-eligible historic district in the neighborhood, and that the subject property is not individually eligible under Criterion 1.

There is no evidence that the Town School for Boys is directly associated with the lives of persons important in our local, regional, or national past. Therefore, 2700 Jackson Street does not appear eligible under Criterion 2.

The 1956, 1958, and 1965 sections of the school building at 2700 Jackson Street were designed by Clarence W. Mayhew. The 1971 section was designed by ROMA Architects, and the 1983 section was designed by Robert H. Hersey. The later sections of the building are not age-eligible for historic resource evaluation since there has not been a sufficient passage of time to review their potential historical significance in context. However, the Mayhew portions of the building can be reviewed against Criterion 3 for historical significance, taking into account the fact that their integrity has been altered by the later additions.

Mayhew is not listed in the Department's index of Bay Area architects and limited information is available concerning the architect's career. It appears that Mayhew (1906-1994) was a designer of contemporary residential structures in the Bay Area beginning in the late 1920s, and is possibly best known for a residential design of the Manor family house in Orinda constructed in 1937.⁷ While some of his projects were reviewed in architectural publications, there appear to be no professional reviews of the Town School for Boys. This lack of information concerning the architect indicates that Mayhew cannot be considered a master architect per this Criterion. Neither does the building appear to embody the distinctive characteristics of a type, period, region, or method of construction or possess high artistic values. The building was constructed over a series of construction phases generally in the Mid-Century Modern style; however, the building is not exemplary of this style

⁷ Clarence W. W. Mayhew. (2011, August 21). In *Wikipedia, The Free Encyclopedia*. Retrieved 18:59, August 24, 2011, from http://en.wikipedia.org/w/index.php?title=Clarence_W._W._Mayhew&oldid=446005105.

and period as it has been altered significantly since its original construction. Neither does the building appear to be exemplary of the educational building type as no publications indicate that it was innovative or unique in its time or that it has become a model for this type of construction. Lastly, the building is constructed in a simple, unornamented manner using common building materials that do not express a high level of artistic value.

Based upon a review of information in the Departments records, the subject property is not significant under Criterion 4, which is typically associated with archaeological resources. Furthermore, the subject property is not likely significant under Criterion 4, since this significance criteria typically applies to rare construction types when involving the built environment. The subject property is not an example of a rare construction type.

Further, the building does not appear to be eligible for listing as a contributor to a potential historic district. There are several buildings in the area of the subject building that were included in the *Here Today* survey and the 1976 Planning Department Architectural Survey; however, the project site does not appear to be in a California-Register-eligible historic district. Additionally, the project site is too far from any existing historic buildings to cause an impact to off-site historic resources. Therefore, the building is not a historic resource. As a result, the proposed project, including any exterior alterations, would have no impact on historic resources.

Impact CP-2: The proposed project could result in damage to, or destruction of, as-yet unknown archeological remains, should such remains exist beneath the project site. (Less than Significant with Mitigation)

Factors considered in determining the potential for encountering archeological resources include the location, depth, and amount of excavation proposed, as well as any existing information about known resources in the area. Development of the proposed project would require excavation to depths of approximately 30-feet below ground surface (bgs), about 11,000 cubic yards of soil, for the below-grade addition. Due to the proposed excavation work, the Planning Department conducted a study to determine if any archeological resources would be impacted. In a memorandum dated April 18, 2011, the Planning Department staff determined that there appear to

be no CEQA-significant archeological deposits present at the project site.⁸ The excavation work has the potential to disturb soils; however, based on review of archeological documentation of the affected area, no CEQA-significant archeological resources are expected within project-affected soils. Additionally, in order to reduce the potential impacts of any accidental discovery of potentially significant archeological resources, the project sponsor would be required to comply with **Mitigation Measure M-CP-2**, which would reduce this impact to less-than-significant.

The following mitigation measure has been agreed to by the project sponsor and is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a)(c).

Mitigation Measure M-CP-2: Archeology Resources (Accidental Discovery)

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

If the ERO in consultation with the California State Lands Commission (CSLC) determines that an archeological resource may be present within the project site, the project sponsor shall retain the

⁸ Memorandum from Randall Dean/Don Lewis, San Francisco Planning Department to Chelsea Fordham, San Francisco Planning Department, April 18, 2011. A copy of this memorandum is available for public review at the Planning Department, 1650 Mission Street, 4th Floor, as part of Case File no. 2011.0277E.

services of a qualified archeological consultant. The archeological consultant shall advise the ERO and the CSLC as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the requirements of the ERO and the CSLC. Any required archeological investigation or data recovery plan shall conform to the requirements of State law for a salvage/excavation permit involving a submerged archeological site (Pub. Res. Code §. 6313 (d), (e), and (f)). The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO and CSLC that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Copies of the Draft FARR shall be sent to the ERO and the CSLC for review and approval. Once approved by the ERO and the CSLC, copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department and the CSLC shall receive two copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO and the CSLC may require a different final report content, format, and distribution than that presented above.

Impact CP-3: The proposed project would not indirectly destroy a unique paleontological resource or site or unique geologic feature. (Less than Significant)

Paleontology is a multidisciplinary science that combines elements of geology, biology, chemistry, and physics in an effort to understand the history of life on earth. Paleontological resources, or fossils, are the remains, imprints, or traces of once-living organisms preserved in rocks and sediments. Paleontological resources include vertebrate, invertebrate, and plant fossils or the trace or imprint of such fossils. The fossil record is the only evidence that life on earth has existed for more than 3.6 billion years. Fossils are considered nonrenewable resources because the organisms from which they derive no longer exist. Thus, once destroyed, a fossil can never be replaced. Paleontological resources are lithologically dependent; that is, deposition and preservation of paleontological resources are related to the lithologic unit in which they occur. If the rock types representing a deposition environment conducive to deposition and preservation of fossils are not favorable, fossils will not be present. Lithological units which may be fossiliferous include sedimentary and volcanic formations.

The project site is generally underlain by clayey sand and Colma Formation and Franciscan bedrock. The proposed excavation to 30-feet below grade would be in clayey sand and Colma Formation and Franciscan bedrock, which would not contain geologic formations containing lithological units containing fossils. Therefore, the proposed project would have less-than-significant impacts on paleontological resources or geological features.

Impact CP-4: The proposed project may disturb human remains. (Less than Significant with Mitigation)

Impacts on Native American burials are considered under Public Resources Code (PRC) Section 15064.5(d)(1). When an Initial Study identifies the existence of, or the probable likelihood of, Native American human remains within the project site, the CEQA lead agency is required to work with the appropriate tribal entity, as identified by the California Native American Heritage Commission (NAHC). The CEQA lead agency may develop an agreement with the appropriate tribal entity for testing or disposing of, with appropriate dignity, the human remains and any items associated with Native American burials. By implementing such an agreement, the project becomes exempt from the general prohibition on disinterring, disturbing, or removing human remains from any location other than the dedicated cemetery (Health and Safety Code Section 7050.5) and the requirements of CEQA pertaining to Native American human remains. The project's treatment of human remains

and of associated or unassociated funerary objects discovered during any soils-disturbing activity would comply with applicable state laws, including immediate notification of the City and County of San Francisco (CCSF) Coroner. If the Coroner were to determine that the remains are Native American, the NAHC would be notified and would appoint a Most Likely Descendant (PRC Section 5097.98).

The Planning Department's 2006 archeological sensitivity analysis⁹ did not identify the project site as a site of potential Native American burials. As such the project is not anticipated to disturb any human remains, including Native American burials. Nonetheless, **Mitigation Measure M-CP-2**, specified above, contains language to ensure the sound handling of any encountered human remains.

Impact CP-C: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the vicinity, would not result in cumulative impacts to cultural resources. (Less than Significant)

The Town School for Boys was constructed in phases from 1956 to 1983, and is not considered a historic resource. Additionally, the project site is not within the boundaries, or adjacent to, a designated or potential historic district. Cumulative projects within the vicinity include 2727 Pacific Avenue, 2555 Divisadero Street, and 2712 Broadway. These projects are not proposing demolition or significant alternation of a historic building. Therefore, the proposed project and other cumulative projects would not have a significant impact on a historic district or off-site historical resource.

Given the above, it is not expected that the proposed project in combination with other cumulative projects would have historic impacts that could combine with the impacts of the proposed project. Further, even if these projects did have impacts related to historic resources, the proposed project would not contribute in a cumulatively considerable way to any substantial adverse effect to historical resources. The proposed project would not affect on- or off-site historic resources. Therefore impacts to historic architectural resources are less than significant and the proposed project would not result in cumulative impacts to historic architectural resources.

⁹ *Ibid*

Demolition and excavation activities on the project site, has the potential to affect archeological resources. However, impacts to archeological resources are reduced to a less-than-significant level with implementation of Mitigation Measures M-CP-2, as discussed above. Any future projects in the project vicinity would also be subject to guidelines similar to Mitigation Measures M-CP-2. Implementation of Mitigation Measures M-CP-2, would reduce potential project-related impacts to archeological resources, individually and cumulatively, to less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
5. TRANSPORTATION AND CIRCULATION— Would the project:					
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project site is not located within an airport land use plan area or in the vicinity of a private airstrip. The proposed project would not interfere with air traffic patterns. Therefore, checklist item 5c is not applicable.

Setting

The project site is located in the Pacific Heights neighborhood, on the northwest corner of Scott and Jackson Streets on the block bounded by Pacific Avenue to the north, Scott Street to the east, Jackson Street to the south, and Divisadero Street to the west. Divisadero Street west of the project site is designated as secondary arterial in the Congestion Management Program (CMP) Network and part of the Metropolitan Transportation System (MTS) Network.¹⁰ Scott Street, in this location, is an approximate 40-foot-wide, two-way street with one travel lane in each direction with off-street parking on both sides of the street. Jackson Street in this location, is an approximate 40-foot-wide, two-way street with one travel lane in each direction with off-street parking on both sides of the street.

Muni bus routes in the project vicinity include the 3-Jackson and 24-Divisadero. Additionally, within a short walking distance (three blocks) along Fillmore Street are Muni bus routes 10-Townsend and the 22-Fillmore. There is a bus stop directly adjacent to the project site at the northeast corner of Jackson and Scott Streets. Designated bicycle routes near the project site are located along Clay and Steiner Streets, which are both two blocks from the project site.¹¹

Impact TR-1: The proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, nor would the proposed project conflict with an applicable congestion management program. (Less than Significant)

Policy 10.4 of the Transportation Element of the San Francisco General Plan states that the City will “Consider the transportation system performance measurements in all decisions for projects that affect the transportation system.” To determine whether the proposed project would conflict with a transportation- or circulation-related plan, ordinance or policy, this section analyzes the proposed project’s effects on intersection operations, transit demand, impacts on pedestrian and bicycle circulation, parking and freight loading, as well as construction impacts.

Trip Generation

The proposed project would construct a two phased addition of 19,460 sf to an existing school to increase the size of the school from 54,540 sf to 74,000 sf. The proposed addition would construct a

¹⁰ San Francisco General Plan, Transportation Element- Map 6, Adopted July 1995.

¹¹ San Francisco General Plan, Transportation Element- Map 13, Adopted July 1995.

new multi-purpose room and classrooms, and renovate the existing school. The project would not change the current enrollment from the existing 400 students. The proposed new classrooms and multi-purpose room would be primarily used during daytime, school hours, as an accessory use to the existing school. The proposed multi-purpose room would also be used for some non-school hours, including on average 4-7 basketball games per year, and occasional school events from the hours of 6 PM to 8:30 PM. Additionally, the proposed facilities would be used on eight Saturdays per year from 8:00 AM to 1:00 PM for basketball games. The proposed project would not, however, increase the number of students or staff at Town School for Boys.

The change in traffic in the project area as a result of the proposed project would be undetectable to most drivers during the school hours because the project would not increase students or staff on the campus. Therefore, the proposed project's impact on existing vehicular traffic is considered less than significant.

Parking

The San Francisco *Planning Code* states that off-street parking and loading spaces need be provided only in the case of a major addition to such structure or use, and only in the quantity required for the major addition itself. Any lawful deficiency in off-street parking or loading spaces existing on such effective date may be carried forward for the structure or use, apart from such major addition. The *Planning Code* states that elementary schools need to provide one off-street parking space for each six classrooms and for secondary school, one off-street parking space is required for each two classrooms. Additionally, school auditoriums or multi-purpose rooms are not required to provide any new accessory off-street parking space. This is because school multi-purpose rooms are considered an accessory use to a school if it is not used as a classroom nor rented out to non-school events. The proposed project would construct three new elementary school (K-5) classrooms and four secondary school (6-8) classrooms, and would therefore be required to provide three off-street parking spaces. The project sponsor will be requesting a modification from this requirement as part of the PUD approval for the overall project. The school currently has 14 parking permits issued annually by the SFMTA, as well as 8 on-site bicycle parking spaces. The proposed project will also provide on-site bicycle racks. Additionally, the proposed two-phased addition would not increase the number of students or staff at the Town School for Boys campus.

San Francisco does not consider parking supply as part of the permanent physical environment. Parking conditions are not static, as parking supply and demand varies from day to day, from day to night, from month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of travel.

Parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA. Under CEQA, a project's social impacts need not be treated as significant impacts on the environment. Environmental documents should, however, address the secondary physical impacts that could be triggered by a social impact. (CEQA Guidelines § 15131(a)). The social inconvenience of parking deficits, such as having to hunt for scarce parking spaces, is not an environmental impact, but there may be secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality impacts, safety impacts, or noise impacts caused by congestion. In the experience of San Francisco transportation planners, however, the absence of a ready supply of parking spaces, combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and a relatively dense pattern of urban development, induces many drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service in particular, would be in keeping with the City's "Transit First" policy. The City's Transit First Policy, established in the City's Charter Section 16.102 provides that "parking policies for areas well served by public transit shall be designed to encourage travel by public transportation and alternative transportation." As discussed above, the project area is well-served by local public transit (Muni lines 24, 35, and 37) and bike lanes (40 and 50), which provide alternatives to auto travel.

The transportation analysis accounts for potential secondary effects, such as cars circling and looking for a parking space in areas of limited parking supply, by assuming that all drivers would attempt to find parking at or near the project site and then seek parking farther away if convenient parking is unavailable. Moreover, the secondary effects of drivers searching for parking is typically offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking in the vicinity of the proposed project would be minor, and the traffic assignments used in

the transportation analysis, as well as in the associated air quality, noise and pedestrian safety analyses, reasonably addresses potential secondary effects.

Loading

No off-street loading spaces would be provided for the proposed project, and none are required in the *Planning Code* for RH-2 districts that have a gross square-footage of less than 100,000 sf. The proposed 19,460 sf two-phased addition would not increase the number of delivery or service vehicles to the project site. Deliveries using standard delivery services like FedEx or UPS and the proposed project would not contribute additional loading trips. The project's delivery and service trips could be met at the existing 135 foot white curb zone on Jackson Street, where the building's pedestrian entrance is located. The existing student pick-up and drop-off requires that vehicles enter the white zone for drop-off and pick-up at times that are staggered twice a day to limit the number of students arriving or departing at the same time. Additionally, the project would not increase the number of students and would therefore not result in an increased demand for passenger loading. Loading activity would not pose a significant impact for pedestrian flow or transit.

Construction Impacts

Construction activities would include daily vehicle trips generated by the arrival and departure of construction workers. Approximately 30 workers would commute to the construction site each day for approximately 14 months for grading the site and construction of the Core Modernization/Expansion Phase addition. The Glazing Efficiency Upgrade phase would result in an expansion of 1,201 sf and would require a construction period of 3 months, and therefore would have lesser impacts than the Core Modernization/Expansion Phase. Truck movements during periods of peak traffic flow would have greater potential to create conflicts than during non-peak hours because of the greater numbers of vehicles on the streets during the peak hour that would have to maneuver around queued trucks. Construction traffic would use Lombard Street to Scott Street, load and then turn left on Jackson then turn left on Pierce back down to Lombard Street. Construction activities associated with the proposed project are not anticipated to result in substantial impacts on the City's transportation network. Construction material staging and storage are anticipated to occur onsite, within the boundaries of the existing school facility, and construction would not result in disruption to the adjacent bus stops.

However, as required, the project sponsor and construction contractors would meet with the City's Transportation Advisory Staff Committee (TASC) to determine feasible measures to reduce traffic congestion, including effects on the transit system and pedestrian circulation impacts during construction of the proposed project. TASC consists of representatives from the San Francisco Fire Department (SFFD), San Francisco Police Department (SFPD), MTA Traffic Engineering Division, and Department of Public Works, which provides recommendations on construction projects that impact the public right-of-way. Thus, impacts related to an applicable transportation circulation system plan or policy would be less than significant, and the project would not conflict with any applicable congestion management program

While construction-related impacts would be less than significant, improvement measures could be implemented to further reduce these less-than-significant impacts.

Improvement Measure IM-TR-1: Construction Traffic Measures

The following measures would further minimize disruption of the general traffic flow on adjacent streets:

- To the extent possible, truck movements should be limited to the hours between 9:00 a.m. and 3:30 p.m. (or other times, if approved by SFMTA). Additionally, the project should consider limiting truck movements at the project site during their peak-period drop-off or pick-up time periods (7:45 to 8:30 a.m. and 1:30 to 3:30 p.m.).

Impact TR-2: The proposed project would not substantially increase hazards due to a design feature or incompatible uses. (Less than Significant)

The project site is located on a developed block of San Francisco. The proposed project would result in a two-phased addition to an existing school building within the existing boundaries of the school. There are no project features that would substantially increase traffic-related hazards. In addition, as discussed in Section F.1, Land Use and Land Use Planning, the project does not include incompatible uses. Therefore, transportation hazard impacts due to a design feature or resulting from incompatible uses would be less than significant.

Impact TR-3: The proposed project would not result in inadequate emergency access. (Less than Significant)

Emergency access would remain unchanged from existing conditions. Emergency vehicles would continue to access the site from Jackson and Scott Streets. The proposed project would not inhibit emergency access to the project site. The proposed project would not be expected to affect emergency response times or access to other sites. Therefore, the project would have a less than significant impact on emergency access to the project site or any surrounding sites.

Impact TR-4: The proposed project would not conflict with adopted policies, plans or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such features. (Less than Significant)

Transit Conditions

The project site is well served by public transit, with MUNI providing service in the immediate vicinity. MUNI lines passing within three blocks of the project site include the 3-Jackson, 24-Divisadero, 10-Townsend, and 22-Fillmore lines. The nearest BART station (Civic Center) is approximately two miles south of the project site on Market Street. The increase in transit demand associated with the project would not noticeably affect transit services in the area or affect acceptable transit operations because there would be no increase in students or staff associated with the project. There are two bus stops for the 3-Jackson line directly adjacent to the project site at the northeast corner and the southwest corner of Jackson and Scott Streets. The project would not include new curb cuts or off-street parking that would conflict with bus operations on Jackson Street; therefore, no impacts to bus circulation were identified. The proposed project would not conflict with adopted policies, plans or programs supporting alternative transportation. For all of the above reasons, no significant impacts related to transit would result from the proposed project.

It should be noted that transit-related policies include, but are not limited to: (1) discouragement of commuter automobiles (Planning Code Section 101.1, established by Proposition M, the Accountable Planning Initiative); and (2) the City's "Transit First" policy, established in the City's Charter Section 16.102. The proposed project would not conflict with transit operations as discussed above and would also not conflict with the transit-related policies established by Proposition M or the City's Transit First Policies.

Therefore, impacts to the City's transit network would be considered less than significant.

Bicycle Conditions

In the vicinity of the project site there are two bicycle routes nearby to the project site, including Route #45 on Steiner Street and Route #10 on Clay Street. These routes are interconnected to the Citywide Bicycle Network and provide access to and from the study area from locations throughout the City. Any increase in traffic generated by the project would not be substantial enough to affect bicycle travel in the area, and project impacts on bicycles would be less than significant.

Pedestrian Conditions

Pedestrian conditions in the vicinity of the project, on both sidewalks and crosswalks, were observed to be operating at acceptable levels of service. The project is not expected to substantially change the existing pedestrian conditions because there would be no increase in the number of students or staff as a result of the project and it would not result in any significant impacts on pedestrian conditions.

Impact C-TR: The proposed project in combination of past, present, and reasonably foreseeable future projects would not result in substantial cumulative transportation impacts. (Less than Significant)

If construction of the proposed project were to overlap with construction of 2727 Pacific Avenue, 2555 Divisadero Street, and 2712 Broadway projects, it could result in temporary increase in construction-related traffic on local streets. The combined construction impacts would not be significant because they are temporary and would not result in permanent, cumulatively considerable transportation impacts. Additionally, since the proposed project would not result in the addition of students or staff to the project site, the project would not contribute significantly to cumulative conditions, and it would therefore, not have any significant cumulative traffic impacts.

For the reasons discussed above, the proposed project's impacts related to transportation, both individually and cumulatively, would be less than significant.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
6. NOISE—Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Be substantially affected by existing noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project site is not within an airport land use plan area, nor is it in the vicinity of a private airstrip. Therefore, topics 6e and 6f are not applicable.

Impact NO-1: The proposed project would not result in the exposure of persons to or generation of noise levels in excess of established standards, nor would the proposed project result in a substantial permanent increase in ambient noise levels or otherwise be substantially affected by existing noise. (Less than Significant)

Exposure to Noise during Operation

Ambient noise levels in the vicinity of the project site are typical of noise levels in neighborhoods in San Francisco, which are dominated by vehicular traffic, including trucks, cars, Muni buses, emergency vehicles, and land use activities, periodic temporary construction-related noise from nearby development, or street maintenance. Noises generated by the existing school use are common and generally accepted in urban areas. Based on modeling of traffic noise volumes conducted by the San Francisco Department of Public Health (DPH),¹² the project site has an

¹² Traffic noise map presented on DPH website: <http://www.sfdph.org/dph/EN/Noise/default.asp>

ambient traffic noise level of 65-70 dba, which is below the threshold for discouraging placement of sensitive uses. Additionally, the proposed project is an addition to an existing school and the project would not result in the addition of students or faculty; therefore, the project would not result in the placement of any additional sensitive receptors to noise levels in excess of established standards.

Generation of Traffic Noise during Operation

Vehicular traffic makes the greatest contribution to ambient noise levels throughout most of San Francisco. Generally, traffic must double in volume to produce a noticeable increase in the ambient noise level in the project vicinity. The proposed would result in a two phased addition to the existing school building, and would not result in an increase in students or faculty to the Town School for Boys campus or any associated increase in traffic volumes. Therefore, the proposed project would not cause a noticeable increase in the ambient noise level in the project vicinity, and this impact would be less than significant.

Generation of Building Noise during Operation

The proposed project may include mechanical equipment, such as forced air mechanical ventilation, which would produce operational noise. These operations would be subject to the San Francisco Noise Ordinance (Article 29, Section 2909 of the San Francisco Police Code), which limits noise from building operations. As amended in November 2008, this section establishes a noise limit from mechanical sources, such as building equipment, specified as a certain noise level in excess of the ambient noise level at the property line: for noise generated by residential uses, the limit is 5 dBA in excess of ambient, while for noise generated by commercial and industrial uses, the limit is 8 dBA in excess of ambient and for noise on public property, including streets, the limit is 10 dBA in excess of ambient. Compliance with Article 29, Section 2909, would minimize noise from building operations. Additionally, the proposed Core Modernization/Expansion Phase would construct a below-grade addition under the existing rooftop play area, and would replace the play area in-kind after completion of the below grade addition. Because the rooftop play area would be replaced in-kind, the project would not generate any new operational noises associated with additional or changes to human voice levels within the project area vicinity. Additionally, all other portions of the proposed project would be interior additions and would not be generate additional operational noise that would increase ambient noise levels. Therefore, noise effects related to building operation would be less than significant, and building would not contribute to a considerable increment to any cumulative noise impacts from mechanical equipment.

Impact NO-2: During construction, the proposed project would result in a temporary or periodic increase in ambient noise levels and vibration in the project vicinity above levels existing without the project, but any construction-related increase in noise levels and vibration would be considered a less than significant impact. (Less than Significant)

The construction of the two phased addition to the existing Town School for Boys would result in a horizontal and below grade addition to the existing Town School for Boys. The proposed Core Modernization/Expansion Phase would result in excavation below the existing first floor to a depth of 30 feet below grade for the construction of a proposed new multi-purpose room and classrooms. The demolition and excavation for the proposed additions would temporarily increase noise in the vicinity. Noise and vibration levels over the estimated 14-month construction period would fluctuate depending on the construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers. Construction noises associated with the proposed project would include demolition, excavation, truck traffic, and site work.

Of these, demolition, excavation, and site work would likely generate the most construction-related noise. Throughout the construction period there would be truck traffic to and from the site, hauling away demolition materials and debris, or delivering building materials. It is anticipated that the construction hours would be normal working hours during the week, with possible limited work during weekends. Noise from demolition, excavation, and construction activities, especially impact tools, drilling machines, and excavators could result in noise peaks and ground vibration that may disrupt nearby residents. Excavation to approximately 30 feet below grade would be required for the proposed project, including removal of 20 feet of bedrock. This would be done by using excavators, backhoes and bobcats with the dump trucks entering the site, loading, and then exiting the site. Noise levels would be sporadic rather than continuous in nature because of the different types of construction equipment used. According to the project sponsor, excavation could last approximately 32 days for the construction of the proposed project.

Construction noise is regulated by the San Francisco Noise Ordinance (Article 29 of the Police Code). The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA at a distance of 100 feet from the source. Impact tools (e.g., jackhammers, impact wrenches) must have boot intake and exhaust muffled to the satisfaction of DPW or DBI. Section 2908 of the ordinance prohibits construction between 8:00 PM and 7:00 AM, if noise would exceed the ambient noise level by 5 dBA at the project site's property line, unless a

special permit is authorized by DPW or DBI. Compliance with the noise ordinance would reduce most potential construction noise impacts to a less than significant level, including noise effects on residential uses in the immediate vicinity, which are considered sensitive receptors.

Sensitive receptors are people requiring quiet, for sleep or concentration, such as residences, schools, or hospitals, and people themselves who may be relatively more susceptible to adverse health impacts from their environment, such as immune-compromised individuals, populations with elevated levels of chronic illness, children, and the aged. Sensitive noise receptors in proximity to the project area are residents directly adjacent to the project site to the north along Pacific Avenue, east along Scott Street, and west along Jackson Street, and students at the adjacent Sterne School and the on-site students at the Town School for Boys.

Construction activities other than excavators generate noise levels no greater than 90 dBA (for instance, for excavation) at 50 feet from the activity, while other activities, such as concrete work, are much less noisy. Closed windows typically can reduce daytime interior noise levels to an acceptable level. Therefore, for nearby sensitive receptors, although construction noise could be annoying at times, it would not be expected to exceed noise levels commonly experienced in an urban environment, and would not be considered significant. Heavy excavation construction activities would primarily occur inside the existing school building; however, the project could temporarily exceed noise thresholds. Due to the amount of required excavation of bedrock, and location of nearby sensitive receptors, the project construction could result in a potentially significant impact. Given the above-mentioned City noise regulations, the temporary nature of construction work, and implementation of **Mitigation Measure M-NO-2**, construction noise would have a less-than-significant effect on the environment. Additionally, Improvement Measure IM-T-1, proposed to minimize the disruption of traffic flow by limiting truck movement to the hours between 9:00 AM and 3:30 PM, would also have the secondary effect of reducing the construction noise impacts.

Mitigation Measure M-NO-2: Reduction of Construction Noise

The following measures would further minimize construction noise impacts on sensitive receptors:

- Construction equipment shall be properly maintained in accordance with manufacturers' specifications and shall be fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All impact tools shall be

shrouded or shielded, and all intake and exhaust ports on power equipment shall be muffled or shielded.

- Construction equipment shall not idle for extended periods of time near noise-sensitive receptors.
- Stationary equipment (compressors, generators, and cement mixers) shall be located as far from sensitive receptors as feasible. Sound enclosures shall be used during noisy operations on-site.
- Temporary barriers (noise blankets or wood paneling) shall be placed around the construction site parcels and, to the extent feasible, they should break the line of sight from noise sensitive receptors to construction activities. For temporary sound blankets, the material shall be weather and abuse resistant, and shall exhibit superior hanging and tear strength with a surface weight of at least 1 pound per square foot. Placement, orientation, size, and density of acoustical barriers shall be reviewed and approved by a qualified acoustical consultant.
- When temporary barrier units are joined together, the mating surfaces shall be flush with each other. Gaps between barrier units, and between the bottom edge of the barrier panels and the ground, shall be closed with material that would completely close the gaps, and would be dense enough to attenuate noise.

Impact C-NO: The proposed project, in combination with past, present, and reasonably foreseeable future projects, would not result in substantial cumulative noise impacts. (Less than Significant)

Construction activities in the vicinity of the project site, such as excavation, grading, or construction of other buildings in the area, would occur on a temporary and intermittent basis, similar to the project and are also required to comply with the Noise Ordinance. Project construction-related noise would not substantially increase ambient noise levels at locations greater than a few hundred feet from the project site with compliance with the Noise Ordinance and implementation of **Mitigation Measure M-NO-2**. As such, construction noise effects associated with the proposed project are not anticipated to combine with proposed projects at 2727 Pacific Avenue, 2555 Divisadero Street, and 2712 Broadway. Therefore, cumulative construction-related noise impacts would be less than significant.

Local traffic noise would not increase significantly in conjunction with other cumulative projects because the proposed project would not result in an increase of students or staff on the project site, and cumulative projects would not result in substantial population growth in the project vicinity. Because neither the proposed project nor the other cumulative impacts in the vicinity are anticipated to result in a doubling of traffic volumes along nearby streets, the project would not contribute considerably to any cumulative traffic-related increases in ambient noise. Moreover, the proposed project’s mechanical equipment and occupants would be required to comply with the Noise Ordinance and would therefore not be expected to contribute to any cumulative increases in the ambient noise as a result of the building equipment or occupants. Therefore, the proposed project would not result in cumulatively considerable noise impacts, and cumulative noise impacts are considered less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
7. AIR QUALITY—Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Background

The proposed project is in the City and County of San Francisco, within the San Francisco Bay Area Air Basin (SFBAAB). In addition to San Francisco, the SFBAAB encompasses Alameda, Contra Costa, Marin, Napa, San Mateo, and Santa Clara Counties, the southern half of Sonoma County, and the southwestern portion of Solano County. The Bay Area Air Quality Management District (BAAQMD) is the regional agency with jurisdiction over the nine-county Bay Area Air Basin.

Regulatory Setting

The federal Clean Air Act (CAA) requires the US Environmental Protection Agency (EPA) to establish and periodically review National Ambient Air Quality Standards (national standards or NAAQS) to protect public health and welfare. National standards have been established for the following seven air pollutants, many of which have been made more stringent by California standards: ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter equal to or less than 10 micrometers (coarse particulates or PM₁₀), particulate matter equal to or less than 2.5 micrometers (fine particulates or PM_{2.5}), and lead.

The California Air Resources Board (ARB) manages air quality, regulates mobile emissions sources, and oversees the activities of county and regional air districts in California. The ARB regulates local air quality indirectly by establishing California Ambient Air Quality Standards (state standards or CAAQS) and vehicle emissions standards, and by conducting research, planning, and coordination activities. California has adopted ambient standards that are more stringent than the federal standards for the seven criteria air pollutants.

The Bay Area Air Quality Management District (BAAQMD) has jurisdiction over the San Francisco Bay Area Air Basin that encompasses nine counties, including San Mateo County. The BAAQMD is responsible for ensuring that federal and state air quality standards are met by monitoring ambient air pollutant levels throughout the region and implementing strategies to attain the standards. The Association of Bay Area Governments, Metropolitan Transportation Commission, county transportation agencies, cities and counties, and various nongovernmental organizations are involved in managing air quality in the region.

The BAAQMD monitors air quality at more than 30 locations throughout the San Francisco Bay Area. The closest currently operating monitoring station to the project site is located approximately 10 miles north at 16th and Arkansas Sts in San Francisco. Criteria pollutants monitored at this location include O₃, CO, NO₂, SO₂, PM₁₀, and PM_{2.5}. A summary of the monitored pollutants for 2007 through 2009 shows a trend of generally improving (i.e., lower) concentrations over this time period.

Under the CAA, the EPA has classified the San Francisco Bay Area as marginally nonattainment for the 1997 8-hour O₃ standard and required attainment of the standard by 2007. The EPA determined

that the San Francisco Bay Area has met this standard, but before a formal redesignation can be assigned, a formal request and Maintenance Plan must be submitted. In May 2008, the EPA lowered the 8-hour O₃ standard from 0.080 parts per million (ppm) to 0.075 ppm and, in January 2010, the EPA again proposed to revise this standard to between 0.060 ppm and 0.070 ppm. The new attainment/nonattainment designation for the San Francisco Bay Area is expected to be issued within one year from final adoption of the revised standards.

In December 2008, the EPA proposed to designate the entire San Francisco Bay Area as nonattainment for the 24-hour PM_{2.5} NAAQS that was scheduled to become effective in April 2009; the effective date for this designation is still pending.

Under the California Clean Air Act (CCAA), patterned after the federal CAA, areas have also been designated as attainment or nonattainment with respect to the state standards. With respect to state standards, the San Francisco Bay Area is currently designated as a nonattainment area for O₃ and both PM₁₀ and PM_{2.5}.

Approach to Analysis

This section discusses the thresholds for determining whether a project would result in a significant air quality impact. Table 1: Air Quality Thresholds of Significance for Criteria Air Pollutants and Health Risks and Hazards summarizes the air quality thresholds of significance used for this document, followed by a discussion of each threshold. Although the BAAQMD's adoption of significance thresholds for air quality analysis in 2010 and 2011 are the subject of recent judicial actions, the Planning Department has determined that Appendix D of the BAAQMD CEQA Air Quality Guidelines, in combination with BAAQMD's Revised Draft Options and Justification Report, provide substantial evidence to support the BAAQMD recommended thresholds. Therefore, the Planning Department has determined they are appropriate for use in this analysis as standards of significance.

Table 1, below, summarizes the air quality thresholds of significance, followed by a discussion of each threshold.

Table 1			
Air Quality Significance Thresholds			
Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Annual Average Emissions (tons/year)
Criteria Air Pollutants			
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82	82	15
PM _{2.5}	54	54	10
CO	Not Applicable	9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	
Health Risks and Hazards for New Sources			
Excess Cancer Risk	10 per one million	10 per one million	
Chronic or Acute Hazard Index	1.0	1.0	
Incremental annual average PM _{2.5}	0.3 µg/m ³	0.3 µg/m ³	
Health Risks and Hazards for Sensitive Receptors (Cumulative from all sources within 1,000 foot zone of influence) and Cumulative Thresholds for New Sources			
Excess Cancer Risk	100 per one million		
Chronic Hazard Index	10.0		
Annual Average PM _{2.5}	0.8 µg/m ³		

Ozone Precursors. The SFBAAB is currently designated as non-attainment for ozone and particulate matter (PM₁₀ and PM_{2.5}).¹³ Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NO_x). The BAAQMD is the primary regulatory agency in the

¹³ PM_{2.5} and PM₁₀ refer to particulate matter that is 2.5 microns in diameter or less and particulate matter that is 10 microns in diameter or less, respectively.

SFBAAB charged with ensuring that the region attains applicable federal and state ambient air quality standards. The potential for a project to result in a cumulatively considerable net increase in criteria air pollutants, which may contribute to an existing or projected air quality violation, are based on the state and federal Clean Air Acts emissions limits for stationary sources. The federal New Source Review (NSR) program was created by the federal CAA to ensure that stationary sources of air pollution are constructed in a manner that is consistent with attainment of federal health based ambient air quality standards. Similarly, to ensure that new stationary sources do not cause or contribute to a violation of an air quality standard, BAAQMD Regulation 2, Rule 2 requires that any new source that emits criteria air pollutants above a specified emissions limit must offset those emissions. For ozone precursors, ROG and NO_x, the offset emissions level is an annual average of 10 tons per year (or 54 lbs. per day).¹⁴ These levels represent emissions by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants.

Although this regulation applies to new or modified stationary sources, land use development projects result in ROG and NO_x emissions as a result of increases in vehicle trips, architectural coating and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of land use projects and those projects that result in emissions below these thresholds, would not be considered to contribute to an existing or projected air quality violation or result in a considerable net increase in ROG and NO_x emissions. Because construction activities are temporary in nature only the average daily thresholds are applicable to construction phase emissions.

Particulate Matter (PM₁₀ and PM_{2.5}). The BAAQMD has not established an offset limit for PM_{2.5} and the current federal Prevention of Significant Deterioration (PSD) offset limit of 100 tons per year for PM₁₀ is too high and would not be an appropriate significance threshold for the SFBAAB considering the nonattainment status of PM₁₀. However, the emissions limits provided for in the federal NSR that applies to stationary sources that emit criteria air pollutants in areas that are currently designated as nonattainment is an appropriate significance threshold. For PM₁₀ and PM_{2.5}, the emissions limit under NSR is 15 tons per year (82 lbs. per day) and 10 tons per year (54 lbs. per day), respectively. These emissions limits represent levels at which a source is not expected to have

¹⁴ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*. October 2009. At page 17.

an impact on air quality.¹⁵ Similar to ozone precursor thresholds identified above, land use development projects typically result in particulate matter emissions as a result of increases in vehicle trips, space heating and natural gas combustion, landscape maintenance, and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of a land use project. Those projects that result in emissions below the NSR emissions limits would not be considered to contribute to an existing or projected air quality violation or result in a considerable net increase in PM₁₀ and PM_{2.5} emissions. Because construction activities are temporary in nature only the average daily thresholds are applicable to construction-phase emissions.

Other Criteria Pollutants. Regional concentrations of CO in the SFBAAB have not exceeded the CAAQS in the past 11 years and SO₂ concentrations have never exceeded the standards. The primary source of CO impacts from land use projects are vehicle traffic. Construction-related SO₂ emissions represent a negligible portion of the total basin-wide emissions and construction-related CO emissions represent less than five percent of the SFBAAB total basin-wide CO emissions.¹⁶ The SFBAAB is designated as attainment for both CO and SO₂. Furthermore, the BAAQMD has demonstrated that in order to exceed the California ambient air quality standard of 9.0 ppm (8-hour average) or 20.0 ppm (1-hour average) for CO, project traffic in addition to existing traffic would need to exceed 44,000 vehicles per hour at affected intersections (or 24,000 vehicles per hour where vertical and/or horizontal mixing is limited). Therefore, given the SFBAAB's attainment status and the limited CO and SO₂ emissions that could result from a land use projects, land use projects would not result in a cumulatively considerable net increase in CO or SO₂, and quantitative analysis not required.

Fugitive Dust. Fugitive dust emissions are typically generated during construction phases. Studies have shown that the application of best management practices (BMPs) at construction sites significantly control fugitive dust.¹⁷ Individual measures have been shown to reduce fugitive dust

¹⁵ Ibid, p. 16.

¹⁶ Ibid, p. 27.

¹⁷ Western Regional Air Partnership. 2006. *WRAP Fugitive Dust Handbook*. September 7, 2006. This document is available online at http://www.wrapair.org/forums/dejff/dh/content/FDHandbook_Rev_06.pdf, accessed February 16, 2012.

by anywhere from 30 percent to 90 percent.¹⁸ The BAAQMD has identified a number of BMPs to control fugitive dust emissions from construction activities.¹⁹

Health Risks and Hazards from New or Modified Sources. Construction activities typically require the use of heavy-duty diesel vehicles and equipment, which emit diesel particulate matter (DPM). ARB identified DPM as a toxic air contaminant (TAC) in 1998, based on evidence demonstrating cancer effects in humans.²⁰ The exhaust from diesel engines includes hundreds of different gaseous and particulate components, many of which are toxic. Mobile sources such as trucks and buses are among the primary sources of diesel emissions, and concentrations of DPM are higher near heavily traveled highways. Other sources of health risks and hazards include: gas stations, stationary diesel engines (i.e., backup generators), dry cleaners, crematories, spray booths, diesel-fueled railroads, major ports, railyards, airports, oil refineries, power plants, and cement plants.²¹ Land use projects that require a substantial amount of heavy-duty diesel vehicles and equipment, as well as projects that require stationary sources, such as a diesel backup generator, would result in emissions of DPM and possibly other TACs that may affect nearby sensitive receptors. Construction-phase TACs, however, would be temporary, and current health risk modeling methodologies are associated with longer-term exposure periods of 9, 40 and 70 years, which do not correlate well with the temporary and highly variable nature of construction activities, resulting in difficulties with producing accurate modeling results.²² Nevertheless, DPM is a known TAC and therefore, appropriate thresholds are identified to ensure that a project does not expose sensitive receptors to substantial pollutant concentrations.

Similar to criteria pollutant thresholds identified above, the BAAQMD Regulation 2, Rule 5 sets cancer risk limits for new and modified sources of TACs at the maximally exposed individual

¹⁸ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*. October 2009, p. 27.

¹⁹ BAAQMD, *CEQA Air Quality Guidelines*, May 2011. This document is available online at <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx>, accessed February 27, 2012.

²⁰ California Air Resources Board, Fact Sheet, "The Toxic Air Contaminant Identification Process: Toxic Air Contaminant Emissions from Diesel-fueled Engines," October 1998. This document is available online at <http://www.arb.ca.gov/toxics/dieseltac/factsht1.pdf>, accessed February 27, 2012. This document is also available for review at the Planning Department, 1650 Mission Street, Suite 400, in Case File No. 2004.0093E.

²¹ BAAQMD, *Recommended Methods for Screening and Modeling Local Risks and Hazards*, May 2011, p. 11.

²² BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, p. 29.

(MEI). In addition to cancer risk, some TACs pose non-carcinogenic chronic and acute health hazards. Acute and chronic non-cancer health hazards are expressed in terms of a hazard index, or HI, which is a ratio of the TAC concentration to a reference exposure level (REL), a level below which no adverse health effects are expected, even for sensitive individuals.²³ In accordance with Regulation 2, Rule 5, the BAAQMD Air Pollution Control Officer shall deny any permit to operate a source that results in an increased cancer risk of 10 per million or an increase chronic or acute HI of 1.0 at the MEI. This threshold is designed to ensure that the source does not contribute to a cumulatively significant health risk impact.²⁴

In addition, particulate matter, primarily associated with mobile sources (vehicular emissions) is strongly associated with mortality, respiratory diseases, and impairment of lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease. Based on toxicological and epidemiological research, smaller particles and those associated with traffic appear more closely related to health effects.²⁵ Therefore, estimates of PM_{2.5} emissions from a new source can be used to approximate broader potential adverse health effects. The United State Environmental Protection Agency (EPA) has proposed a Significant Impact Level (SIL) for PM_{2.5}. For developed urban areas, including much of San Francisco, the EPA has proposed a SIL of between 0.3 µg/m³ to 0.8 µg/m³. The SIL represents the level of incremental PM_{2.5} emissions that represents a significant contribution to regional non-attainment.²⁶ The BAAQMD has determined that on balance the annual average PM_{2.5} threshold of 0.3 µg/m³ will afford the same health protections as required by San Francisco's Health Code Article 38.²⁷ Therefore the lower range of the EPA recommended SIL of 0.3 µg/m³ is an appropriate threshold for determining the significance of a source's PM_{2.5} impact.

²³ Ibid, p. D-35.

²⁴ BAAQMD. *CEQA Air Quality Guidelines*. May 2011. Available online at <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx>, p. D-40.

²⁵ San Francisco Department of Public Health, *Assessment and Mitigation of Air Pollutant Health Effects for Intra Urban Roadways: Guidance for Land Use Planning and Environmental Review*, May 2008, p. 5.

²⁶ BAAQMD. *CEQA Air Quality Guidelines*, May 2011, available online at <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx>, p. D-36.

²⁷ Ibid, p. 41.

In determining the potential distance that emissions from a new source (construction sources or operational sources) may affect nearby sensitive receptors, a summary of research findings in ARB's *Land Use Compatibility Handbook* suggest that air pollutants from high volume roadways are substantially reduced or can even be indistinguishable from upwind background concentrations at a distance of 1,000 feet downwind from sources such as freeways and large distribution centers.²⁸ Given the scientific data on dispersion of TACs from a source, the BAAQMD recommends assessing impacts of sources of TACs on nearby receptors within a 1,000-foot radius.²⁹ This radius is also consistent with ARB's *Land Use Compatibility Handbook* and Health and Safety Code Section 42301.6 (Notice for Possible Source Near School).³⁰

In summary, potential health risks and hazards from new sources on existing or proposed sensitive receptors are assessed within a 1,000-foot zone of influence and risks and hazards from new sources that exceed any of the following thresholds at the MEI are determined to be significant: excess cancer risk of 10 per one million, chronic or acute HI of 1.0, and annual average PM_{2.5} increase of 0.3 µg/m³.

Health Risks and Hazards for New Receptors. As discussed above, sources of TACs have the greatest impact on receptors that are located in close proximity to pollutant sources. The further away from a significant source of TACs, the less a receptor is exposed to hazardous air pollutants. As described above, BAAQMD recommends assessing the impacts of sources of TACs within 1,000 feet of a sensitive receptor. Therefore, an analysis of the potential impacts to new receptors should consider all cumulative sources of TACs within the 1,000-foot zone of influence. For projects siting new sensitive receptors, existing and proposed sources of TACs should not expose new sensitive receptors to an excess cancer risk greater than 100 per one million. This absolute limit is based on EPA guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level.³¹ As described by the BAAQMD, the EPA considers a cancer risk of 100 per million to be within the "acceptable" range of cancer risk. Furthermore, in the 1989

²⁸ BAAQMD, *CEQA Air Quality Guidelines*, May 2011. This document is available online at <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx>, p. D-38.

²⁹ *Ibid*, p. D-40.

³⁰ *Ibid*, p. 40.

³¹ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, p. 67.

preamble to the benzene National Emissions Standards for Hazardous Air Pollutants (NESHAP) rulemaking,³² the EPA states that it "...strives to provide maximum feasible protection against risks to health from hazardous air pollutants by (1) protecting the greatest number of persons possible to an individual lifetime risk level no higher than approximately one in one million and (2) limiting to no higher than approximately one in ten thousand [100 in one million] the estimated risk that a person living near a plant would have if he or she were exposed to the maximum pollutant concentrations for 70 years." The 100 per one million excess cancer cases is also consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on BAAQMD regional modeling.³³ Therefore, when siting new sensitive receptors near sources of TACs and other hazardous air pollutants, the threshold for an incremental increase in cancer risk is 100 per million.

The BAAQMD's Air Toxics Hot Spots (ATHS) program provides guidance for implementing the Air Toxics Hot Spots Information and Assessment Act (Assembly Bill 2588, Connelly, 1987; Chaptered in the California Health and Safety Code Section 44300 et. al.). Accordingly, the BAAQMD has established a non-cancer chronic HI of 10.0. Any sources exceeding this level are required to implement mandatory risk reduction levels. As such, a chronic non-cancer HI of 10.0 from cumulative sources of TACs is an appropriate threshold when siting sensitive land uses.³⁴

As discussed previously, the EPA is proposing a SIL for PM_{2.5} ranging from 0.3 µg/m³ to 0.8 µg/m³. The SIL is intended to ensure that a source does not result in a cumulatively significant contribution to ambient PM_{2.5} levels. Therefore, the upper-bound SIL of 0.8 µg/m³ from all sources within 1,000 feet of a sensitive receptor is an appropriate level for determining a significant impact to new sensitive receptors.³⁵

When siting new sensitive receptors, the thresholds identified above represent the cumulative limits from all sources within a 1,000-foot zone of influence from the new receptor; therefore single-source thresholds are unnecessary.

³² 54 Federal Register 38044, September 14, 1989.

³³ BAAQMD, *Revised Draft Options and Justification Report, California Environmental Quality Act Thresholds of Significance*, October 2009, p. 67.

³⁴ BAAQMD, *CEQA Air Quality Guidelines*, May 2011. This document is available online at <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx>, p. D-43.

³⁵ *Ibid*, p. D-43.

Cumulative Air Quality Impacts. Regional air quality impacts are by their very nature cumulative impacts. Emissions from past, present and future projects contribute to adverse regional air quality impacts on a cumulative basis. No single project by itself would be sufficient in size to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulative adverse air quality impacts.³⁶ As described above, the project-level thresholds for criteria air pollutants are based on levels by which new sources are not anticipated to contribute to an air quality violation or result in a considerable net increase in criteria air pollutants. Therefore, if a project's emissions are below the project-level thresholds, the project would not be considered to result in a considerable contribution to cumulative regional air quality impacts.

With respect to localized health risks and hazards, as described above, the significance thresholds for new receptors represent a cumulative impact analysis as this analysis considers all potential sources that may result in adverse health impacts within a receptor's zone of influence. Similarly, new sources that contribute to health risks and hazards at nearby sensitive receptors that exceed these cumulative thresholds would result in a significant health risk and hazards impact to existing sensitive receptors.

Consistency with Applicable Air Quality Plan. The BAAQMD has published the *2010 Clean Air Plan*, representing the most current applicable air quality plan for the SFBAAB. Consistency with this plan is the basis for determining whether the proposed project would conflict with or obstruct implementation of an applicable air quality plan.

Impact AQ-1: Construction of the proposed project would not generate a substantial amount of fugitive dust emissions. (Less than Significant)

Project-related excavation and grading and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Although there are federal standards for air pollutants and implementation of state and regional air quality control plans, air pollutants continue to have impacts on human health throughout the country. California has found that particulate matter exposure can cause health effects at lower levels than national standards. The current health burden of particulate matter demands that, where possible, public agencies take

³⁶ BAAQMD, *California Environmental Quality Act (CEQA) Air Quality Guidelines*, June 2010; and adopted Thresholds of Significance, June 2010. This document is available online at <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQA-GUIDELINES/Updated-CEQA-Guidelines.aspx>, p. 2-1.

feasible available actions to reduce sources of particulate matter exposure. According to the California Air Resources Board (CARB), reducing ambient particulate matter from 1998–2000 levels to natural background concentrations in San Francisco would prevent over 200 premature deaths.

Dust can be an irritant causing watering eyes or irritation to the lungs, nose, and throat. Excavation, grading, and other construction activities can cause wind-blown dust to add to particulate matter in the local atmosphere. Depending on exposure, adverse health effects can occur due to this particulate matter in general and also due to specific contaminants such as lead or asbestos that may be constituents of soil.

For fugitive dust emissions, the 2010 Air Quality Guidelines recommend their most current best management practices, which has been a pragmatic and effective approach to the control of fugitive dust emissions. The Air Quality Guidelines note that individual measures have been shown to reduce fugitive dust by anywhere from 30 percent to more than 90 percent and conclude that projects that implement BAAQMD’s recommended construction best management practices will reduce fugitive dust emissions to a less-than-significant level.³⁷

The San Francisco *Building Code* Section 106A.3.2.6.3 requires a “no visible dust” requirement with the intent of reducing the quantity of dust generated during site preparation, demolition and construction work in order to protect the health of the general public and of on-site workers, minimize public nuisance complaints, and to avoid orders to stop work by the Department of Building Inspection (DBI).

The Building Code requires that all site preparation work, demolition, or other construction activities within San Francisco that have the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures whether or not the activity requires a permit from DBI. The project involves a two-phased addition to an existing school. The project would be required to comply with the Building Code’s dust control requirements.

Below are the following regulations and procedures set forth in Section 106A.3.2.6.3 of the San Francisco Building Code’s General Dust Control Requirements:

³⁷ *Ibid*, Section 4.2.1.

- Water all active construction areas sufficiently to prevent dust from becoming airborne. Increased watering frequency may be necessary whenever wind speeds exceed 15 mile per hour. Reclaimed water must be used if required by Article 21, Section 1100 et seq. of the San Francisco Public Works Code. If not required, reclaimed water should be used whenever possible;
- Provide as much water as necessary to control dust (without creating run-off) in an area of land clearing, earth movement, excavation, drillings, and other dust-generating activity;
- During excavation and dirt-moving activities, wet sweep or vacuum the streets, sidewalks, paths, and intersections where work is in progress at the end of the workday;
- Cover any inactive (no disturbance for more than seven days) stockpiles greater than ten cubic yards or 500 square feet of excavated materials, backfill material, import material, gravel, sand, road base, and soil with a 10 mil (0.01 inch) polyethylene plastic or equivalent tarp and brace it down or use other equivalent soil stabilization techniques; and
- Use dust enclosures, curtains, and dust collectors as necessary to control dust in the excavation area.

Therefore, compliance with the San Francisco Building Code's General Dust Control Requirements would ensure that the project's fugitive dust impacts would be less than significant.

Impact AQ-2: Construction of the proposed project would not violate an air quality standard or contribute to an existing or projected air quality violation. (Less than Significant)

The air quality thresholds of significance for criteria air pollutant emissions resulting from construction or operation of a proposed project is whether the project would emit reactive organic gases (ROG), oxides of nitrogen (NO_x), or fine particulate matter (PM₁₀) in excess of 54 lbs./day or whether the project would emit particulate matter (PM₁₀) in excess of 82 lbs./day.³⁸

The air quality thresholds state that the first step in determining the significance of criteria air pollutants and ozone precursors related to construction or operation of a proposed project is to compare the attributes of the proposed project with the applicable screening criteria provided in

³⁸ The thresholds for criteria air pollutants have generally been lowered with the exception of PM₁₀. The threshold for PM₁₀ has been increased from 80 lbs./day to 82 lbs./day. The difference between the 1999 and 2010 thresholds would not change the conclusions of this analysis.

the Air Quality Guidelines.³⁹ The purpose of this comparison is to provide a conservative indication of whether construction or operation of the proposed project would result in the generation of criteria air pollutants or ozone precursors that exceed the air quality thresholds of significance. If all of the screening criteria are met by a proposed project, then the lead agency or applicant does not need to perform a detailed air quality assessment of the project's air pollutant emissions, and construction or operation of the proposed project would result in a less-than-significant criteria air pollutant impact. If the proposed project does not meet all the screening criteria, then project emissions need to be quantified and compared against the thresholds of significance.⁴⁰

The Air Quality Guidelines note that the screening levels are generally representative of new development on greenfield⁴¹ sites without any form of mitigation measures taken into consideration. In addition, the screening criteria do not account for project design features, attributes, or local development requirements that could also result in lower emissions. For projects that are mixed-use, infill, and/or proximate to transit service and local services, emissions would be less than the greenfield-type project that the screening criteria are based upon.

Vehicle exhaust resulting from on- and off-road construction equipment may emit criteria air pollutants. The proposed project includes a two-phased addition to an existing school of 19,460 sf. Based on a review of the Air Quality Guidelines' screening tables, a detailed analysis of construction-related criteria air pollutants and ozone precursors would not be required. According to the screening table for elementary schools, the threshold for construction would be 277,000 sq.ft. Thus, the project would not exceed any of the thresholds of significance for criteria air pollutants and would result in a less-than-significant air quality impact related to construction exhaust emissions.

³⁹ Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, June 2010, at page 3-2 to 3-3.

⁴⁰ *Ibid*, p. 3-1.

⁴¹ Agricultural or forest land or undeveloped site earmarked for commercial, residential, or industrial projects.

Impact AQ-3: Operation of the proposed project would not violate an air quality standard or contribute to an existing or projected air quality violation. (Less than Significant)

A screening-level analysis for project operations was conducted to determine whether operation of the proposed project could exceed the air quality thresholds of significance. Projects that exceed the screening level sizes require a detailed air quality analysis. Projects below the screening levels would not be anticipated to exceed BAAQMD's 2010 significance thresholds for ROG, NO_x, PM₁₀ and PM_{2.5}.

According to the screening table for operational criteria pollutant for an elementary school the threshold would be 271,000 sf. The proposed project includes the construction of a two-phased addition to an existing school of 19,460 sf, and thus is well below the screening level that requires a detailed air quality assessment of criteria air pollutant emissions. Therefore, the project would not result in the generation of criteria air pollutants and ozone precursors that exceed the air quality thresholds of significance and operational criteria air pollutants and ozone precursors would be less than significant.

Impact AQ-4: Operation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations. (Less than Significant)

The 2010 Air Quality Guidelines also recommend an analysis of health risk impacts, which are effects related to the placement of a new sensitive receptor (for example, a residential project) in proximity to source(s) of toxic air contaminants (TACs) and particulate matter. The air quality thresholds of significance for health risk impacts are an increase in lifetime cancer risk of 10 chances in one million, an increase in the non-cancer, chronic or acute, hazard index greater than 1.0, and an increase in the annual average concentration of PM_{2.5} in excess of 0.3 micrograms per cubic meter. If a single roadway or stationary source exceeds any one of these thresholds, the project would be considered to expose sensitive receptors to a significant health risk impact. The proposed project would not result in the exposure of any new sensitive receptors because the project would not result in an increase of students or staff on the project site. Therefore, the proposed project would not result in exposure of any new sensitive receptors to substantial pollutant concentrations, and this impact would be less than significant.

Impact AQ-5: Construction of the proposed project could expose sensitive receptors to substantial pollutant concentrations. (Less than Significant with Mitigation)

Toxic air contaminants (TACs) are air pollutants that may lead to serious illness or increased mortality, even when present in relatively low concentrations. There are hundreds of different types of TACs with varying degrees of toxicity. For the proposed project, the TAC of greatest concern is diesel particulate matter (DPM) that would be emitted by heavy construction equipment. Project construction would require the use of off-road construction equipment and would result in an increase in vehicle trips associated with construction workers and construction equipment. Sensitive receptors are people or institutions with people that are particularly susceptible to illness from environmental pollution, such as the elderly, very young children, people already weakened by illness (e.g., asthmatics), residents, and persons engaged in strenuous exercise. The air quality thresholds of significance for health risk impacts are an increase in lifetime cancer risk of 10 chances in one million, an increase in the non-cancer, chronic or acute, hazard index greater than 1.0, and an increase in the annual average concentration of PM_{2.5} in excess of 0.3 micrograms per cubic meter. If construction of the proposed project exceeds any one of these thresholds, the project would be considered to expose sensitive receptors to a significant health risk impact. To determine whether the proposed project would be below air quality thresholds for TAC exposure, a Construction Health Risk Assessment (HRA) was prepared to evaluate the estimated cancer risk, non-cancer chronic and acute hazard indices (HIs), and PM_{2.5} concentrations associated with diesel exhaust that will be emitted by heavy equipment used in construction.⁴²

Sources utilized in the health risk assessment (HRA) for the project include the BAAQMD's *California Environmental Quality Act (CEQA) Air Quality Guidelines* (CEQA Guidelines) and *Recommended Methods for Screening and Modeling Local Risks and Hazards*, and the Office of Environmental Health Hazard Assessment's (OEHHA) *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*.⁴³ Air quality modeling was conducted using the

⁴² Impact Sciences, Construction Health Risk Assessment, Town School for Boys, July, 2012. A copy of this email is available for public review at the Planning Department, 1650 Mission Street, 4th Floor, as part of Case File No. 2011.0277E.

⁴³ California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, (2003).

ISCST3 model, which is a Gaussian dispersion model and is approved for use in air quality analyses by the BAAQMD.

Existing receptors in the vicinity of the project site would be exposed to TAC emissions generated during construction of the project. Existing receptors in proximity to the project site include residences located directly adjacent to the project site to the north and west, and across Jackson and Scott streets to the south and east, respectfully. Additionally, the Sterne School is located across Scott Street directly east of the project site. Receptors were also placed within the Town School project site as sensitive receptors (students) because they will be located in this area during construction activity. It should be noted that this is a conservative assumption as it assumes that the maximally exposed individual (MEI) would be exposed to the annual average concentration throughout the construction period, when during the actual construction process equipment location would vary within the project site (and TAC concentrations around the site would change).

The HRA determined that the MEI in this case would be Town School students who would be on-site during construction of the proposed project. As shown in Table 2, the on-site students would be exposed to an incremental cancer risk of 14.1 in one million, which is above the BAAQMD threshold of 10 in one million. The HRA determined that the incremental cancer risk to residential adults would be 1.8 and residential child would be 6.4, which are both below the BAAQMD threshold of 10 in one million. Results of the analysis show that the maximum annual PM2.5 concentration would be 0.49 ug/m³ for on-site students, which would be above BAAQMD threshold of 0.3 ug/m³ . The maximum annual PM2.5 concentration for both residential adult and residential child would be 0.24 ug/m³ and would be below the BAAQMD significant threshold.

Table 2: Summary of Construction Health Risk Analysis

Receptor	Mitigation Strategy	PM2.5 Concentrations	Cancer Risk	Exceed Threshold
No Mitigation				
Resident Adult	None	0.24	1.5	NO
Resident Child	None	0.24	5.5	NO
Student	None	0.49	14.1	YES
Mitigation				
Resident Adult	Level 2 diesel particulate filters*	0.16	0.76	NO
Resident Child	Level 2 diesel particulate filters*	0.16	1.1	NO
Student	Level 2 diesel particulate filters*	0.19	2.2	NO

- Controls assumed on cranes, excavator, backhoes, and off-road trucks.

Source: Impact Sciences, Inc. July 2012.

Additionally, as shown in Table 3, the HRA determined that construction of the proposed project would not exceed the chronic non-cancer health impact threshold of 1.0 for any sensitive receptor location surrounding the project site.

Table 3: Summary of Non-Cancer Health Impacts

Receptor Location	Maximum Chronic Hazard Index	Significance Threshold	Exceeds Threshold?
East	0.022	1	
North	0.015	1	NO
West	0.019	1	NO
South	0.018	1	NO

Source: Impact Sciences, Inc. July 2012.

Based on the analysis, presented in Table 2, construction of the proposed project would exceed the air quality thresholds individual health risk significance thresholds for cancer risks and PM2.5 and would be considered a significant impact. Implementation of **Mitigation Measure M-AQ-5: Construction Emissions Minimization Plan** for the Core Modernization and Expansion Phase, described below, would reduce this impact to a less-than-significant level.

Mitigation Measure M-AQ-5: Construction Emissions Minimization Plan

A. *Construction Emissions Minimization Plan.* Prior to issuance of a construction permit, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) for the Core Modernization and Expansion Phase to the Environmental Review Officer (ERO) for review and approval by an Environmental Planning Air Quality Specialist. The Plan shall detail project compliance with the following requirements:

1. Off-road equipment such as cranes, excavators, backhoes, and off-road trucks utilized during the Core Modernization and Expansion Phase trucks shall meet the following requirements:
 - a) All off-road equipment shall have:
 - i. Engines that meet or exceed either USEPA or ARB Tier 2 off-road emission standards, *and*

ii. Engines that are retrofitted with an ARB Level 2 Verified Diesel Emissions Control Strategy (VDECS).⁴⁴

2. The project sponsor shall require the idling time for off-road equipment to be limited to no more than *two* minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the two minute idling limit.

3. The project sponsor shall require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.

4. The Plan shall include estimates of the construction timeline by phase with a description of all such cranes, excavators, backhoes, and off-road trucks required for the Core Modernization and Expansion Phase. Off-road equipment descriptions and information may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date.

5. The Plan shall be kept on-site and available for review by any persons requesting it and a legible sign shall be posted at the perimeter of the construction site indicating to the public the basic requirements of the Plan and a way to request a copy of the Plan. The project sponsor shall provide copies of Plan to members of the public as requested.

B. Reporting. Monthly reports shall be submitted to the ERO indicating the construction phase and off-road equipment information used during each phase including the information required in subsection A(4) above. In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

Within six months of the completion of construction activities, the project sponsor shall submit to the ERO a final report summarizing construction activities. The final report shall indicate the start and end dates and duration of each construction phase. For each phase, the report shall include detailed information required in A(4). In addition, for off-road

⁴⁴ Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

- C. *Certification Statement and On-site Requirements.* Prior to the commencement of construction activities, the project sponsor must certify (1) compliance with the Plan, and (2) all applicable requirements of the Plan have been incorporated into contract specifications.

With implementation of **Mitigation Measure M-AQ-5: Construction Emissions Minimization**, construction of the proposed project would not exceed the air quality significance thresholds for health risk. Based on these results, the proposed project would not result in exposure of sensitive receptors to substantial pollutant concentrations, and this impact would be less than significant.

Impact AQ-6: The proposed project would be consistent with applicable air quality plans. (Less than Significant)

The proposed project would be generally consistent with the General Plan and air quality management plans such as the 2010 Clean Air Plan, which is the applicable regional air quality plan developed for attainment of state air quality standards. Additionally, the General Plan, Planning Code, and the City Charter implement various transportation control measures identified in the City's Transit First Program, bicycle parking regulations, transit development fees, and other actions. Accordingly, the proposed project would not interfere with implementation of the 2010 Clean Air Plan, and this impact would be less than significant.

Impact AQ-7: The proposed project would not create objectionable odors affecting a substantial number of people. (Less than Significant)

The project would not result in a perceptible increase or change in noxious odors on the project site or in the vicinity of the project, as it would not include uses prone to generation of noxious odors. Observation indicates that surrounding land uses are not sources of noticeable odors, and therefore, would not adversely affect project site residents.

Impact C-AQ-1: Construction and operation of the proposed project would not result in a cumulatively considerable net increase in criteria air pollutants or otherwise conflict with regional air quality plans. (Less than Significant)

With respect to cumulative criteria air pollutant impacts, BAAQMD's approach to cumulative air quality analysis is that any proposed project that would exceed the criteria air pollutant thresholds of significance would also be considered to result in a cumulatively considerable increase in criteria

air pollutants. As discussed in Impacts AQ-2 and AQ-3, the proposed project would result in less-than-significant impacts related to construction and operational criteria air pollutant emissions. Therefore, the proposed project's contribution to cumulative criteria air pollutant impacts is less than significant, and the proposed project would not conflict with any regional air quality plan.

Impact C-AQ-2: Operation of the project would not expose sensitive receptors to cumulative sources of air pollutants. (Less than Significant)

The air quality cumulative thresholds are an increased cancer risk of 100 in one million, acute or chronic hazard index greater than 10.0, and a PM_{2.5} concentration greater than 0.8 micrograms per cubic meter. If the total of all roadway and point sources within 1,000 feet of the proposed project exceed these cumulative thresholds, the project would be considered to expose sensitive receptors to a significant cumulative health risk impact.

Cumulative impacts for this project would include the additional impacts of roadways, stationary sources and other construction projects within the 1,000 foot zone of influence. The only stationary source (Van Acker Construction Associates) within 1,000 feet had no health risks or PM_{2.5} emissions associated with it. Similarly, the screening analysis indicated that there are only minor construction projects within the area, and consequently no contributions from other construction projects to increased health risks or PM_{2.5} emissions. However, the project site is near Divisadero Street, which is a heavily-travelled roadway with more than 10,000 vehicles per day and with associated health risks and PM_{2.5} emissions. Using the roadway screening level values for risks and hazards from Divisadero Street, the cumulative impacts for the proposed project for project-related construction emissions and health risks and Divisadero Street are shown below in **Table 4, Cumulative Health Impacts**.

Table 4: Cumulative Health Impacts

Source	Maximum Cancer Health Risk	Maximum PM_{2.5} Concentration (micrograms/cubic meter)
Proposed Project	14.1	0.49
Divisadero Street	1.18	0.039
Sum	15.28	0.53
Significance Threshold	100	0.8
Exceeds Threshold?	NO	NO

Source: Impact Sciences, Inc. June 2012.

As shown in Table 4, the cumulative impacts would not exceed the applicable cumulative significance thresholds. Therefore, the cumulative risk from all stationary and mobile sources would be below the BAAQMD cumulative thresholds of significance (excess cancer risk of 100 in one million, chronic and acute Hazard Index of 10, or a PM_{2.5} increase of 0.8 micrograms per cubic meter). Thus, cumulative and project level impacts involving exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

Impact C-AQ-3: Construction of the project would not expose sensitive receptors to cumulative sources of air pollutants. (Less than Significant)

The BAAQMD recommends cumulative thresholds of an increased cancer risk of 100 in one million, acute or chronic hazard index greater than 10.0, and a PM_{2.5} concentration greater than 0.8 micrograms per cubic meter. If the total of all construction projects within 1,000 feet of the proposed project exceed these cumulative thresholds, the project would be considered to expose sensitive receptors to a significant cumulative health risk impact. As described above, with implementation of Mitigation Measure M-AQ-5: Construction Emissions Minimization Plan, construction of the proposed project would not exceed the BAAQMD’s individual health risk significance thresholds. The cumulative risk for construction and all operational sources described in Table 4 above were found to be less than significant. Therefore, the proposed project would be below the BAAQMD cumulative thresholds of significance, and cumulative and project level impacts involving exposure of sensitive receptors to substantial pollutant concentrations would be less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
8. GREENHOUSE GAS EMISSIONS— Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Environmental Setting

Gases that trap heat in the atmosphere are referred to as greenhouse gases (GHGs) because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHG's has been implicated as the driving force for global climate change. The primary GHGs are carbon dioxide, methane, nitrous oxide, ozone, and water vapor.

While the presence of the primary GHGs in the atmosphere are naturally occurring, carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O) are largely emitted from human activities, accelerating the rate at which these compounds occur within earth's atmosphere. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Other GHGs include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. Greenhouse gases are typically reported in "carbon dioxide-equivalent" measures (CO₂E).⁴⁵

There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming. Potential global warming impacts in California may include, but are not limited to, loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years. Secondary effects are likely to include a global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.⁴⁶

The Air Resources Board (ARB) estimated that in 2006 California produced about 484 million gross metric tons of CO₂E (MMT CO₂E), or about 535 million U.S. tons.⁴⁷ The ARB found that transportation is the source of 38 percent of the State's GHG emissions, followed by electricity

⁴⁵ Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

⁴⁶ California Climate Change Portal. Frequently Asked Questions About Global Climate Change. Available online at: <http://www.climatechange.ca.gov/publications/faqs.html>. Accessed November 8, 2010.

⁴⁷ California Air Resources Board (ARB), "California Greenhouse Gas Inventory for 2000-2006— by Category as Defined in the Scoping Plan." http://www.arb.ca.gov/cc/inventory/data/tables/ghg_inventory_scopingplan_2009-03-13.pdf. Accessed March 2, 2010.

generation (both in-state and out-of-state) at 22 percent and industrial sources at 20 percent. Commercial and residential fuel use (primarily for heating) accounted for 9 percent of GHG emissions.⁴⁸ In the Bay Area, fossil fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) and the industrial and commercial sectors are the two largest sources of GHG emissions, each accounting for approximately 36% of the Bay Area's 95.8 MMTCO₂E emitted in 2007.⁴⁹ Electricity generation accounts for approximately 16% of the Bay Area's GHG emissions followed by residential fuel usage at 7%, off-road equipment at 3% and agriculture at 1%.⁵⁰

Regulatory Setting

The following regulations and guidelines are applicable to GHGs in California.

Executive Order S-3-05

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05 that set a series of target dates by which statewide emissions of GHGs would be progressively reduced, as follows:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Assembly Bill 32 – California Global Warming Solutions Act

In 2006, the California legislature passed Assembly Bill (AB) 32 (California Health and Safety Code Division 25.5, Sections 38500, et seq.), also known as the Global Warming Solutions Act. AB 32 requires ARB to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020, a 25 percent reduction.

⁴⁸ Ibid.

⁴⁹ Bay Area Air Quality Management District, Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2007, Updated: February 2010. Available online at: http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/Emission%20Inventory/regionalinventory2007_2_10.ashx. Accessed March 2, 2010.

⁵⁰ Ibid.

AB 32 requires ARB to establish a statewide GHG emissions cap for 2020 based on 1990 emission levels. AB 32 required ARB to adopt regulations by January 1, 2008 that identify and require selected sectors or categories of GHG emitters to report and verify their statewide GHG emissions, and ARB is authorized to enforce compliance with the program. Under AB 32, ARB was also required to adopt a statewide GHG emissions limit by January 1, 2008, equivalent to the statewide GHG emissions levels in 1990 that must be achieved by 2020. ARB established this limit, in December 2007, at 427 MMTCO₂e. This is approximately 30 percent below forecasted business-as-usual emissions of 596 MMTCO₂e, and about 10 percent below average annual GHG emissions from 2002 through 2004.

On January 1, 2011, ARB was required to adopt rules and regulations (that became operative January 1, 2012), to achieve the maximum technologically feasible and cost-effective GHG emission reductions. AB 32 permits the use of market-based compliance mechanisms to achieve those reductions. AB 32 requires ARB to monitor compliance with and enforce any rule, regulation, order, emission limitation, emissions reduction measure, or market-based compliance mechanism that it adopts.

In June 2007, ARB directed staff to pursue 37 early actions for reducing GHG emissions under AB 32. The broad spectrum of strategies to be developed, including a Low Carbon Fuel Standard, regulations for refrigerants with high global warming potential, guidance and protocols for local governments to facilitate GHG reductions, and green ports, reflects that the serious threat of climate change requires action as soon as possible.

In addition to approving the 37 GHG reduction strategies, ARB directed staff to further evaluate early action recommendations made at the June 2007 meeting, and to report back to ARB within 6 months. ARB suggested a desire to attempt to pursue greater GHG emissions reductions in California in the near term. Since the June 2007 ARB hearing, ARB staff has evaluated all 48 recommendations submitted by stakeholders and several internally-generated staff ideas and published the *Expanded List of Early Action Measures To Reduce Greenhouse Gas Emissions In California Recommended For Board Consideration*.⁵¹

⁵¹ ARB. *Expanded List of Early Action Measures To Reduce Greenhouse Gas Emissions In California Recommended For Board Consideration*, October 2007. Available online at: http://www.arb.ca.gov/cc/ccea/meetings/ea_final_report.pdf. Accessed June 17, 2011.

The ARB adopted a scoping plan in December 2008, outlining measures to meet the 2020 GHG reduction limits. To meet these goals, California must reduce its GHG emissions by 30 percent below projected 2020 business-as-usual emissions levels, or about 15 percent below today's levels. In its scoping plan, the ARB estimates a reduction of 174 MMTCO₂e (about 191 million US tons) from the transportation, energy, agriculture, forestry, and high global warming potential sectors (Table 3). The ARB identified an implementation timeline for the GHG reduction strategies in the scoping plan. Some measures may require new legislation to implement, some will require subsidies, some have already been developed, and some will require additional effort to evaluate and quantify. Some emission reduction strategies could require their own environmental review under CEQA or NEPA.

AB 32 anticipates that local government actions will result in reduced GHG emissions. ARB has identified a GHG reduction target of 15 percent from current levels for local governments and notes that successful implementation of the plan relies on local governments' land use planning and urban growth decisions because local governments have primary authority to plan, zone, approve, and permit land development to accommodate population growth and the changing needs of their jurisdictions.

The ARB Scoping Plan relies on the requirements of Senate Bill (SB) 375 to implement the carbon emission reductions anticipated from land use decisions. SB 375 was enacted to align local land use and transportation planning to further achieve the state's GHG reduction goals. SB 375 requires regional transportation plans (RTP), developed by Metropolitan Planning Organizations, to incorporate a "sustainable communities strategy" in their RTPs that would achieve GHG emission reduction targets set by ARB. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development. SB 375 would be implemented over the next several years and the Metropolitan Transportation Commission MTC's 2013 RTP would be its first plan subject to SB 375. SB 97 required the Office of Planning and Research (OPR) to amend the state CEQA Guidelines to address the feasible mitigation of GHG emissions or the effects of GHGs.

Table 5
GHG Reductions from the AB 32 Scoping Plan Sectors⁵²

GHG Reduction Measures By Sector	GHG Reductions (MMTCO _{2e})
Transportation sector	62.3
Electricity and natural gas	49.7
Industry	1.4
Landfill methane control measure (discrete early action)	1
Forestry	5
High global warming potential GHGs	20.2
Additional reductions needed to achieve the GHG cap	34.4
Total	174
Other Recommended Measures	
Government operations	1-2
Agriculture methane capture at large dairies	1
Methane capture at large dairies	1
Additional GHG reduction measures	
Water	4.8
Green buildings	26
High recycling/zero waste	9
<ul style="list-style-type: none"> • Commercial recycling • Composting • Anaerobic digestion • Extended producer responsibility • Environmentally preferable purchasing 	
Total	42.8-43.8

Notes:

GHG = greenhouse gas

MMTCO_{2e} = million gross metric tons of carbon dioxide equivalents

In response, OPR amended the CEQA Guidelines to provide guidance for analyzing GHG emissions. Among other changes to the CEQA Guidelines, the amendments add a new section to the CEQA Initial Study Checklist to address questions regarding the project’s potential to emit GHGs.

California Environmental Quality Act Guidelines Revisions

In 2007, the California legislature passed SB 97 that required amendment of the CEQA Guidelines to incorporate analysis of, and mitigation for, GHG emissions from projects subject to CEQA. The California Natural Resources Agency adopted these amendments on December 30, 2009, and they took effect March 18, 2010, after review by the Office of Administrative Law and filing with the Secretary of State for inclusion in the CCR.

⁵² Ibid.

The CEQA Guideline revisions include a new section (Section 15064.4) that specifically addresses the significance of GHG emissions. Section 15064.4 calls for a good-faith effort to describe, calculate or estimate GHG emissions; Section 15064.4 further states that the significance of GHG impacts should include consideration of the extent to which the project would increase or reduce GHG emissions; exceed a locally applicable threshold of significance; and comply with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. The revisions also state that a project may be found to have a less-than-significant impact if it complies with an adopted plan that includes specific measures to sufficiently reduce GHG emissions (Sec. 15064(h)(3)). Importantly, however, the revised guidelines do not require or recommend a specific analysis methodology or provide quantitative criteria for determining significance of GHG emissions.

Bay Area Air Quality Management District

The BAAQMD is the primary agency responsible for air quality regulation in the nine county San Francisco Bay Area Air Basin. As part of their role in air quality regulation, BAAQMD has prepared CEQA air quality guidelines to assist lead agencies in evaluating air quality impacts of proposed projects and plans. The guidelines provide procedures for evaluating potential air quality impacts during the environmental review process consistent with CEQA requirements. On June 2, 2010, the BAAQMD adopted new and revised CEQA air quality thresholds of significance and issued revised guidelines that supersede the 1999 air quality guidelines. The *CEQA Air Quality Guidelines* provide CEQA thresholds of significance for operational GHG emissions from land use projects for the first time. The BAAQMD has not defined GHG thresholds from construction activities, but recommends that significance be determined in relation to meeting AB 32 GHG reduction targets. OPR's amendments to the CEQA Guidelines as well as BAAQMD's *CEQA Air Quality Guidelines* and thresholds of significance have been incorporated into the analysis of potential GHG impacts associated with the proposed project.

San Francisco Planning Department

On August 12, 2010, the San Francisco Planning Department submitted a draft of the City and County of San Francisco's *Strategies to Address Greenhouse Gas Emissions* to BAAQMD.⁵³ This document presents a comprehensive assessment of policies, programs, and ordinances that

⁵³ San Francisco Planning Department. *Strategies to Address Greenhouse Gas Emissions in San Francisco*. 2010. Internet website: http://sfmea.sfplanning.org/GHG_Reduction_Strategy.pdf. Accessed on October 21, 2011.

collectively represent San Francisco's Qualified Greenhouse Gas Reduction Strategy, in compliance with BAAQMD's *CEQA Air Quality Guidelines* and thresholds of significance.

San Francisco's GHG reduction strategy identifies a number of mandatory requirements and incentives that have measurably reduced GHG emissions, including increasing the energy efficiency of new and existing buildings, installing solar panels on roofs, implementing a green building strategy, adopting a zero waste strategy, passing a construction and demolition debris recovery ordinance, offering a solar energy generation subsidy, incorporating alternative fuel vehicles into the City's transportation fleet (including buses and taxis), and imposing a mandatory composting ordinance. The strategy identifies 42 specific regulations for development that would reduce a project's GHG emissions.

San Francisco's climate change goals, as identified in the 2008 Greenhouse Gas Reduction Ordinance, are:

- By 2008, determine the City's 1990 GHG emissions;
- Reduce GHG emissions by 25 percent below 1990 levels by 2017;
- Reduce GHG emissions by 40 percent below 1990 levels by 2025; and
- Reduce GHG emissions by 80 percent below 1990 levels by 2050.

The City's 2017 and 2025 GHG reduction goals are more aggressive than the State's GHG reduction goals, as outlined in AB 32, and are consistent with the State's 2050 GHG reduction goals. San Francisco's *Strategies to Address Greenhouse Gas Emissions* identifies the City's actions to pursue cleaner energy, energy conservation, and alternative transportation and solid waste policies. It concludes that San Francisco's policies have reduced GHG emissions below 1990 levels, meeting statewide AB 32 GHG reduction goals. As reported, San Francisco's 1990 GHG emissions were approximately 8.26 MMTCO_{2e}, and 2005 GHG emissions are estimated at 7.82 MMTCO_{2e}, representing an approximately 5.3 percent reduction in GHG emissions below 1990 levels.

BAAQMD reviewed San Francisco's *Strategies to Address Greenhouse Gas Emissions* and concluded that the strategy meets the criteria for a Qualified GHG Reduction Strategy, as outlined in BAAQMD's *CEQA Air Quality Guidelines*. The GHG Reduction Strategy provides standards to establish thresholds of significance when analyzing CEQA documents. BAAQMD further stated

that San Francisco's "aggressive GHG reduction targets and comprehensive strategies help the Bay Area move toward reaching the State's AB 32 goals, and also be a model from which other communities can learn."⁵⁴

Impact GG-1: The proposed project would generate greenhouse gas emissions, but not in levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for the purpose of reducing greenhouse gas emissions. (Less than Significant)

The most common GHGs resulting from human activity are CO₂, CH₄, and N₂O.⁵⁵ State law defines GHGs to also include hydrofluorocarbons, perfluorocarbons and sulfur hexafluoride. These latter GHG compounds are usually emitted in industrial processes, and therefore not applicable to the proposed project. Individual projects contribute to the cumulative effects of climate change by directly or indirectly emitting GHGs during construction and operational phases. Direct operational emissions include GHG emissions from new vehicle trips and area sources (natural gas combustion). Indirect emissions include emissions from electricity providers, energy required to pump, treat, and convey water, and emissions associated with landfill operations.

The proposed project would increase the activity onsite by the construction of a two-phased addition to an existing school which would result in an increase in energy use. The addition could also result in an increase in overall water usage which generates indirect emissions from the energy required to pump, treat and convey water. The addition could also result in an increase in discarded landfill materials. Therefore, the proposed project would contribute to annual long-term increases in GHGs as a result of increased operations associated with energy use, water use and wastewater treatment, and solid waste disposal.

As discussed above, the significance of a project's GHG emissions are based on compliance with the City's GHG Reduction Strategy, as this strategy consistent is with AB 32 GHG reduction goals and would continue to reduce GHG emissions below current levels. As discussed in San Francisco's

⁵⁴Letter from Jean Roggenkamp, BAAQMD, to Bill Wycko, San Francisco Planning Department. October 28, 2010.

⁵⁵ Governor's Office of Planning and Research. *Technical Advisory- CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA) Review*. June 19, 2008. Available at the Office of Planning and Research's website at: <http://www.opr.ca.gov/ceqa/pdfs/june08-ceqa.pdf>. Accessed March 3, 2010.

Strategies to Address Greenhouse Gas Emissions, new development and renovations/alterations for private projects and municipal projects are required to comply with San Francisco’s ordinances that reduce GHG emissions. Applicable requirements are shown below in Table 6. A comprehensive analysis of the project’s consistency with San Francisco’s Strategies to Address Greenhouse Gas Emissions is detailed in the project’s GHG Compliance Checklist.¹⁴⁹

Table 6. Regulations Applicable to the Proposed Project

Regulation	Requirements	Project Compliance	Discussion
Transportation Sector			
Commuter Benefits Ordinance (San Francisco Environment Code, Section 421)	<p>All employers of 20 or more employees must provide at least one of the following benefit programs:</p> <p>1. A Pre-Tax Election consistent with 26 U.S.C. § 132(f), allowing employees to elect to exclude from taxable wages and compensation, employee commuting costs incurred for transit passes or vanpool charges, or</p> <p>(2) Employer Paid Benefit whereby the employer supplies a transit pass for the public transit system requested by each Covered Employee or reimbursement for equivalent vanpool charges at least equal in value to the purchase price of the appropriate benefit, or</p> <p>(3) Employer Provided Transit furnished by the employer at no cost to the employee in a vanpool or bus, or similar multi-passenger vehicle operated by or for the employer.</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The project sponsor does provide commuter benefits to its employees.
Energy Efficiency Sector			
San Francisco Green Building Requirements for Stormwater Management (San Francisco Building	Requires all new development or redevelopment disturbing more than 5,000 square feet of ground surface to manage stormwater on-site using low impact design.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does	The proposed sponsor will be designed to manage stormwater on the project site per the San Francisco Stormwater Ordinance. In addition to new landscaping and permeable

Code, Chapter 13C) Or San Francisco Stormwater Management Ordinance (Public Works Code Article 4.2)	Projects subject to the Green Building Ordinance Requirements must comply with either LEED® Sustainable Sites Credits 6.1 and 6.2, or with the City’s Stormwater Management Ordinance and stormwater design guidelines.	Not Comply	paving within the property line on the fronting street, other specific methods of implementation are to be determined.
San Francisco Water Efficient Irrigation Ordinance	<p>Projects that include 1,000 square feet (sf) or more of new or modified landscape are subject to this ordinance, which requires that landscape projects be installed, constructed, operated, and maintained in accordance with rules adopted by the SFPUC that establish a water budget for outdoor water consumption.</p> <p>Tier 1: 1,000 sf <= project landscape < 2,500 sf</p> <p>Tier 2: Project landscape area is greater than or equal to 2,500 sf. Note; Tier 2 compliance requires the services of landscape professionals.</p> <p>See the SFPUC Web site for information regarding exemptions to this requirement.</p> <p>www.sfwater.org/landscape</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project will comply with the San Francisco Water Efficient Irrigation Ordinance.
Waste Reduction Sector			
Mandatory Recycling and Composting Ordinance (San Francisco Environment Code, Chapter 19) and San Francisco Green Building Requirements for solid waste (San Francisco Building Code, Chapter 13C)	<p>All persons in San Francisco are required to separate their refuse into recyclables, compostables and trash, and place each type of refuse in a separate container designated for disposal of that type of refuse.</p> <p>Pursuant to Section 1304C.0.4 of the Green Building Ordinance, all new construction, renovation and alterations subject to the ordinance are required to provide recycling, composting and trash storage, collection, and loading that is convenient for all users of the</p>	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The project owner does currently and will continue to separate their refuse into recyclables, compostables, and trash per the San Francisco Environment Code.

	building.		
Environment/Conservation Sector			
Street Tree Planting Requirements for New Construction (San Francisco Planning Code Section 143)	Planning Code Section 143 requires new construction, significant alterations or relocation of buildings within many of San Francisco's zoning districts to plant on 24-inch box tree for every 20 feet along the property street frontage.	<input checked="" type="checkbox"/> Project Complies <input type="checkbox"/> Not Applicable <input type="checkbox"/> Project Does Not Comply	The proposed project includes two new street trees in addition to the existing street trees on Jackson Street. The project site meets the required number of street trees on Scott Street.

Depending on a proposed project's size, use, and location, a variety of controls are in place to ensure that a proposed project would not impair the State's ability to meet statewide GHG reduction targets outlined in AB 32, nor impact the City's ability to meet San Francisco's local GHG reduction targets. Given that: (1) San Francisco has implemented regulations to reduce greenhouse gas emissions specific to new construction and renovations of private developments and municipal projects; (2) San Francisco's sustainable policies have resulted in the measured success of reduced greenhouse gas emissions levels; (3) San Francisco has met and exceeded AB 32 greenhouse gas reduction goals for the year 2020; (4) current and probable future state and local greenhouse gas reduction measures will continue to reduce a project's contribution to climate change; and (5) San Francisco's *Strategies to Address Greenhouse Gas Emissions* meet BAAQMD's requirements for a Qualified GHG Reduction Strategy, projects that are consistent with San Francisco's regulations would not contribute significantly to global climate change. The proposed project would be required to comply with these requirements, and was determined to be consistent with San Francisco's *Strategies to Address Greenhouse Gas Emissions*.⁵⁶ As such, the proposed project would result in a less than significant impact with respect to GHG emissions.

⁵⁶ Greenhouse Gas Analysis: Compliance Checklist for 2700 Jackson Street. April 23, 2012. This document is on file and available for public review at the Planning Department, 1650 Mission Street, Suite 400, in Case No. 2011.0277E.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
9. WIND AND SHADOW—Would the project:					
a) Alter wind in a manner that substantially affects public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact WS-1: The proposed project would not alter wind in a manner that substantially affects public areas. (Less than Significant)

Wind impacts are generally caused by large building masses extending substantially above their surroundings, and by buildings oriented such that a large wall catches a prevailing wind, particularly if such a wall includes little or no articulation. The proposed project, a two-phased addition to an existing school, would increase the height at certain sections of the existing school including raising the height at the proposed addition from 37'-6" to 40' and the proposed elevator shaft at the northeast corner of the school would reach 55". This would not be substantially taller than the adjacent two- to four-story buildings on the subject block. The proposed project would not result in adverse effects on ground-level winds and the proposed project does not have the potential to cause significant changes to the wind environment in pedestrian areas adjacent or near the project site. Therefore, the proposed project would result in a less-than-significant wind impact.

Impact WS-2: The proposed project would not result in new shadows in a manner that substantially affects outdoor recreation facilities or other public areas. (Less than Significant)

Section 295 of the *Planning Code* was adopted in response to Proposition K (passed November 1984) in order to protect certain public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year round. *Planning Code* Section 295 restricts net new shadow on public open spaces under the jurisdiction of, or to be acquired by, the Recreation and Park Commission by any structure exceeding 40 feet unless the Planning Commission, in consultation with the Recreation and Park Commission, finds the impact to be less than significant. The proposed addition would be a maximum of 40 feet in height and therefore is considered exempt from the 40-X height limit and from the requirements of Section 295. Additionally, the proposed 15' elevator shaft that would raise the northeast corner of the school to 55' is considered exempt from the height limit requirement per *Planning Code* Section 260 and is not

subject to the requirements of Section 295. Therefore, the proposed project would not significantly impact shadow amounts in the project vicinity.

Impact C-WS: The proposed project, in combination with other past, present or reasonably foreseeable projects would not result in less-than-significant wind and shadow impacts. (Less than Significant)

Based on the information provided above, the proposed project, along with other potential and future development in the vicinity, would not result in a significant wind impact in the project vicinity. The design of the 2727 Pacific Avenue, 2555 Divisadero Street, and 2712 Broadway projects would be required to comply with the applicable height and bulk requirements, as defined in the Planning Code and therefore, no building of sufficient height to substantially affect wind would be constructed. As such, the proposed project, in combination with projects currently proposed in the vicinity, would not substantially alter the wind patterns that could affect public areas, and cumulative wind impacts would be considered less than significant.

The proposed project, along with other potential and future development in the vicinity, could result in net new shadows in the vicinity. However, these projects would be subject to the controls of Section 295 to avoid substantial net new shading of public open spaces, including the adjacent Alta Plaza Park, if any cumulative project would involve construction over 40 feet. Thus the proposed project, in combination with cumulative projects considered in this analysis, would not be expected to contribute considerably to adverse shadow effects under cumulative conditions, and cumulative shadow impacts would be considered less than significant.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
10. RECREATION—Would the project:					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Physically degrade existing recreational resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact RE-1: The proposed project would not increase the use of existing neighborhood parks or other recreational facilities. (No Impact)

The nearest recreation facilities to the project site include the Alta Plaza Park, directly adjacent from the project site, and Lafayette Park, four blocks east of the site. The proposed project would not increase the use of existing community recreational facilities and parks in the area because there would be no increase in students, faculty, or residents on the project site. Additionally, the proposed project would construct a multipurpose room, which would accommodate more on-site recreational use for the school. The project would not contribute to the existing demand for public recreational facilities in this area and would not result in substantial physical deterioration of existing recreational resources. Therefore, impacts on recreational activities and facilities would be less than significant.

Impact RE-2: The proposed project would not require the construction of recreational facilities that may have a significant effect on the environment. (No Impact)

The proposed project would construct a two-phased addition to an existing school including the addition of a multi-purpose room for use by its existing students. The proposed project would not increase the use of existing recreational facilities and parks in the area because there would be no increase in students, faculty, or residents on the project site. Therefore, the proposed project would not require the construction of new recreational facilities or the expansion of existing facilities that would themselves have a physical environmental impact.

Impact RE-3: The proposed project would not physically degrade existing recreational facilities. (No Impact)

The proposed project would not result in the physical alteration of any recreational resource within the vicinity of the project site or in the City as a whole. The proposed project would construct an addition of 19,460 sf to an existing school. Therefore, the project would not physically degrade any existing recreational resources.

Impact C-RE: The proposed project, in combination with past, present, and reasonable foreseeable future projects, would not considerably contribute to recreational impacts in the project site vicinity. (Less than Significant)

The use of recreational facilities in the vicinity of the project site is not expected to noticeably increase as a result of the proposed project. As mentioned above, the proposed project would construct a two-phased addition to an existing school and would provide a multi-purpose room for its existing students. Therefore, the contribution of the proposed project to cumulative recreation-related impacts would not be considerable.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
11. UTILITIES AND SERVICE SYSTEMS— Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact UT-1: Implementation of the proposed project would not require or result in the construction of wastewater collection and treatment facilities, new storm water drainage facilities, or expansion of existing facilities. (Less than Significant)

The project site is located within an area that is served by existing utilities and service systems including solid waste disposal, wastewater, and stormwater collection and treatment, power, water and communication facilities. The proposed project would add additional demand to the existing

site, that would incrementally increase the demand for utilities and service systems, but not in excess of amounts expected and provided for in the project area.

The SFPUC provides both water and wastewater service in San Francisco. San Francisco's combined sewer and wastewater treatment system serves the project site, which handles both sewage treatment and stormwater runoff. The proposed project would also require the construction of wastewater facilities, including collection and conveyance pipeline infrastructure. Project related wastewater and stormwater would continue to flow into the City's combined stormwater and sewer system and would be treated to the standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant, prior to discharge into the San Francisco Bay.

The project site is completely covered with impervious surfaces and would remain completely covered with the proposed project. Therefore, the project would not substantially affect the amount of stormwater discharged from the project site. Additionally, the proposed project would be required to meet the standards for stormwater management identified in the San Francisco Green Building Ordinance (SFGBO), adopted May 6, 2008. The SFGBO would require that the project meet the performance standard identified in the LEED NC⁵⁷ credit 6.2 or LEED credit 6.1 for quality control of stormwater. Specifically, this credit requires the project sponsor to implement a stormwater management plan that reduces impervious cover, promotes infiltration, and captures and treats the stormwater runoff for the peak runoff rate and the total runoff volume reduction for the two year 24 hour storm using a variety of best management practices (BMPs). The BMPs must be capable of removing 80 percent of the average annual post-development total suspended solids (TSS). The SFPUC emphasizes the use of low-cost, low impact BMPs to meet this requirement. Although the project would incrementally increase the demand for wastewater treatment and could increase the demand for stormwater treatment, it would not cause the collection treatment capacity to be exceeded, or require the expansion of wastewater treatment facilities or extension of a sewer trunk line. Additionally, requirements for stormwater treatment mandated by the SFGBO would decrease the incremental amount of stormwater requiring treatment at the Southeast Water Pollution Control Plant. Therefore, the proposed project would have a less than significant impact on San Francisco's wastewater and stormwater systems.

⁵⁷ LEED NC stands for Leadership in Energy and Environmental Design- New Construction.

Impact UT-2: The SFPUC has sufficient water supply and entitlements to serve the proposed project, and implementation of the proposed project would not require expansion or construction of new water treatment facilities. (Less than Significant)

The proposed project could incrementally increase the amount of water required to serve the project site. However, the proposed project would not result in a population increase beyond that assumed for planning purposes by the San Francisco Public Utilities Commission's (SFPUC) 2005 Urban Watershed Management Plan.⁵⁸ Additionally, as required by the SFGBO, the project would be required to implement a 20 percent reduction in potable water for other uses (requiring installation of low-flow fixtures). Although the project could increase the amount of water required on site, the increase in water use on the site is accounted for in the SFPUC's 2005 Urban Watershed Management Plan. Also, the project would be required to implement water conservation measures as required by the SFGBO, would be served by the existing water supply and would not require new or expanded water supply resources or entitlements. Therefore, the project's impact on water supply would be less than significant.

Impact UT-3: The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. (Less than Significant)

Solid waste generated by the City and County of San Francisco is transported to the Altamont Landfill. This landfill has a permitted peak maximum disposal capacity of 11,150 tons per day and is operating well below that capacity, at approximately 4,000 to 5,000 tons per day. In addition, the landfill has an annual solid waste capacity of 2,226,500 tons from the City and County of San Francisco. However, the landfill is well below its allowed capacity, receiving approximately 1.29 million tons of solid waste in 2007, the most recent data year available. The total permitted capacity for the landfill is 62 million cubic yards; the remaining capacity is approximately 45.7 million cubic yards.⁷⁶

Recycling, composting, and waste reduction are expected to increasingly divert waste from the landfill, per California and local requirements. The City was required by the State's Integrated

⁵⁸ The SFPUC's 2005 *Urban Water Management Plan* is based on data presented in the Association of Bay Area Government's (*Projections 2002: Forecasts for the San Francisco Bay Area to the Year 2025*, which includes all known or expected development projects in San Francisco through the year 2025.

Waste Management Act (AB 939) to divert 50 percent of its waste stream from landfill disposal by 2000. The City met this threshold in 2003 and has since increased it to 69 percent in 2005 and 70 percent in 2006. In addition, the Board of Supervisors adopted a plan in 2002 to recycle 75 percent of annual wastes generated by 2010.

The proposed project would be in compliance with City Ordinance 100-09, the Mandatory Recycling and Composting Ordinance which requires everyone in San Francisco to separate their refuse into recyclables, compostables, and trash. The school would participate in the City's recycling and composting programs and other efforts to reduce the solid waste disposal stream. The Altamont Landfill is expected to remain operational until at least 2029 and has plans to increase capacity by 250 additional acres.⁷⁷ With the City's increase in recycling and the potential Altamont Landfill expansion, the City's solid waste disposal demand could be met through at least 2029. Given the existing and anticipated increase in solid waste recycling and the proposed landfill expansion, the project would have a less-than-significant impact on solid waste facilities. Therefore, the project's impact on existing landfill capacity would be less than significant.

Impact UT-4: The construction and operation of the proposed project would follow all applicable statutes and regulations related to solid waste. (Less than Significant)

The California Integrated Waste Management Act of 1989 (AB 939) requires municipalities to adopt an Integrated Waste Management Plan (IWMP) to establish objectives, policies, and programs relative to waste disposal, management, source reduction, and recycling. Reports filed by the San Francisco Department of the Environment showed the City generated 1.88 million tons of waste material in 2002. Approximately 63 percent (1.18 million tons) was diverted through recycling, composting, reuse, and other efforts while 700,000 tons went to a landfill.⁵⁹ San Francisco residents currently divert approximately 72 percent of their solid waste to recycling and composting, bringing the city's residents closer to their goal of 75 percent diversion by 2010 and 100 percent by 2020.⁶⁰ The solid waste associated with the proposed project's construction would be required to

⁵⁹ San Francisco Office of the Controller, Community Indicators Report. Available on the internet at: http://www.sfgov.org/wcm_controller/community_indicators/physicalenvironment/index.htm. Accessed March 12, 2009.

⁶⁰ San Francisco Department of the Environment. Zero Waste. Website available at: <http://sfgov.org/site/frame.asp?u=http://www.sfenvironment.org>. Accessed February 11, 2009.

divert 65 percent of all non-hazardous construction waste for recycling and reuse, as required by the Construction, Demolition and Debris Ordinance.

San Francisco Ordinance No. 27-06 requires a minimum of 65 percent of all construction and demolition debris to be recycled and diverted from landfills. Furthermore, the project would be required to comply with City’s Ordinance 100-09, the Mandatory Recycling and Composting Ordinance, which requires everyone in San Francisco to separate their refuse into recyclables, compostables, and trash. With waste diversion and expansions that have occurred at the Altamont Landfill, there is adequate capacity to accommodate San Francisco’s solid waste.

Therefore, solid waste generated from the project’s construction and operation would not substantially affect the projected life of the landfill, and the impacts related to solid waste would be less than significant.

Impact C-UT: In combination with past, present, and reasonably foreseeable future development in the project site vicinity, the proposed project would not have a substantial cumulative impact on utilities and service systems. (Less than Significant)

Cumulative development in the project area would incrementally increase demand on citywide utilities and service systems, but not beyond levels anticipated and planned for by public service providers. Given that the City’s existing service management plans address anticipated growth in the region, the project would not be expected to have a considerable effect on utility service provision or facilities under cumulative conditions.

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
12. PUBLIC SERVICES— Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Impact PS-1: The proposed project would not increase demand for police service, and would not result in substantial adverse impacts associated with the provision of such service. (Less than Significant)

The existing school building currently receives police protection services from the San Francisco Police Department (SFPD). The Richmond police station located at 461 6th Ave, approximately two miles from the project site, serves the project site. The construction of a two-phased addition to an existing school would not create additional demand for police services in the area because the proposed project would not increase the number of students or staff on the project site. Given the nature of the proposed project, it would not necessitate the construction of a new police station and would have a less than significant effect on police protection services.

Impact PS-2: The proposed project would not increase demand for fire protection services, and would not result in substantial adverse impacts associated with the provision of such service. (Less than Significant)

The proposed project could increase the demand for fire protection services within the project area during construction of the project. The nearest fire station to the project site is Station #38 located at 2150 California Street, which is about 1 mile from the project site. However, the operation of the proposed two-phased addition to the school would not create additional demand for fire suppression in the area because the proposed project would not increase the number of students or staff on the project site. Additionally, the SFPD has sufficient resources to accommodate a project of this size. Therefore, this impact would be less than significant.

Impact PS-3: The proposed project would not directly or indirectly generate school students and there would be no impact on existing school facilities. (No Impact)

The proposed project would not add new population to the area, and therefore, would not have an impact on schools. The proposed project would construct a 19,460 sf addition to an existing private K-8 school. The proposed project would not result in a substantial unmet demand for school facilities and would not necessitate new or physically altered school facilities. Therefore, the proposed project would have no impact on schools.

Impact PS-4: The proposed project would not increase the demand for government services, and there would be no impact on government facilities. (No Impact)

The proposed project would not result in a population increase that would necessitate the need for new or physically altered government facilities, and therefore would have no impact on governmental facilities.

Impact C-PS: The proposed project, combined with past, present, and reasonably foreseeable future projects in the vicinity, would not have a substantial cumulative impact to public services. (Less than Significant)

The proposed project is not expected to incrementally increase demand for public services. Cumulative development in the project area would incrementally increase demand for public services, but not beyond levels anticipated and planned for by public service providers. Thus, cumulative impacts to public services would be less than significant.

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
13. BIOLOGICAL RESOURCES— Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Under CEQA criteria, a project would have significant impacts on biological resources if it were to substantially affect candidate, sensitive, or special status species, riparian habitat or other sensitive natural community or wetlands, interfere with the movement of any migratory fish, wildlife, established native resident, or migratory wildlife corridors, conflict with local policies or ordinances related to biological resources, or conflict with any habitat conservation plan. There are no adopted habitat conservation plans applicable to the project site, so criterion E.13.f is not applicable to the proposed project.

Impact BI-1: The proposed project would have no impact on special status species, avian species, or riparian, wetland, or sensitive natural communities and would not conflict with an approved local, regional, or state habitat construction plan. (No Impact)

The project site and the majority of the Pacific Heights neighborhood around the project site are developed and covered with structures and other impermeable surfaces. The project site is occupied by the existing Town School for Boys. The proposed project would not result in the removal of existing trees. The project site does not provide habitat for any rare or endangered plant or animal species, and the proposed project would not affect or diminish plant or animal habitats, including riparian or wetland habitat. The project would not interfere with any resident or migratory species, affect any rare, threatened, or endangered species, or involve tree removal. Given the conditions present on the project site and in the area, the proposed project would have no impact on biological resources.

Impact BI-2: Implementation of the proposed project would not conflict with local tree protection regulations. (Less than Significant)

The San Francisco Planning Department, Department of Building Inspection (DBI), and Department of Public Works (DPW) have established guidelines to ensure that legislation adopted by the Board of Supervisors governing the protection of trees is implemented. The DPW Code Section 8.02-8.11 requires disclosure and protection of Landmark, Significant, and Street trees, collectively "protected trees" located on private and public property. A Landmark tree has the highest level of protection and must meet certain criteria for age, size, shape, species, location, historical association, visual quality, or other contribution to the city's character and have been found worthy of landmark status after public hearings at both the Urban Forestry Council and the

Board of Supervisors. A Significant tree is either located on property under the jurisdiction of the DPW, or on privately owned land within 10 feet of the public-right-of-way, and is greater than 20 feet in height or meets other criteria.

A Tree Disclosure Statement prepared for the project noted that eight trees are located on the subject property and the adjacent property that are considered Significant trees, and there are 18 Street trees adjacent to the project site along Jackson and Scott Streets. There are no Landmark trees on properties adjacent to the site. As mentioned above, the project does not include tree removal. The removal of a protected tree would require issuance of a permit from the Director of Public Works, and may be subject to replacement or payment of an in-lieu fee in the form of a contribution to the City's Adopt-a-Tree Fund. Compliance with the requirements set forth in DPW Code Section 8.02-8.11 would ensure that potential impacts to trees protected under the City's Tree Preservation Ordinance would be less than significant.

Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

Impact C-BI: The proposed project, combined with past, present, and reasonably foreseeable future projects in the vicinity, would not result in substantial cumulative adverse impacts to biological resources. (Less than Significant)

Cumulative projects are discussed on page 19. Given the above, it is not expected that the proposed project would result in cumulative impacts in combination with the proposed projects at 2727 Pacific Avenue, 2555 Divisadero Street, and 2712 Broadway projects. Even if these projects did have biological impacts, the proposed project would not contribute in a cumulatively considerable way that would affect a rare or endangered species or habitat, or conflict with any local, regional or state habitat conservation plan or ordinance. Therefore, the project would not result in any significant cumulative biological impacts.

For the reasons described above, biological impacts, both project-specific and cumulative, would be less than significant.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
14. GEOLOGY AND SOILS—					
Would the project:					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Change substantially the topography or any unique geologic or physical features of the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The proposed project would connect to the City's sewer and stormwater collection and treatment system and would not use a septic water disposal system. Therefore, Topic 14e is not applicable to the project site.

Impact GE-1: The proposed project would not result in exposure of people and structures to substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, expansive soils, seismic ground-shaking, liquefaction, or lateral spreading. (Less than Significant)

The project site is not located within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act and no known or potentially active fault exists on the project site. In a seismically active area, such as the San Francisco Bay Area, the possibility exists for future faulting

in areas where no faults previously existed. A geotechnical analysis has been completed for the project site.^{61,62} The analysis examined underlying soils of the project site and made preliminary geotechnical recommendations related to excavation operations on the project site. The analysis indicates that the project site is suitable for the construction of the proposed project and found no evidence of active faulting on the project site. However, during an earthquake at any of the major area faults mentioned above, the project site would experience very strong ground shaking. Strong ground shaking during an earthquake can result in ground failure associated with soil liquefaction,⁶³ lateral spreading,⁶⁴ and cyclic densification.⁶⁵

The San Francisco General Plan Community Safety Element contains maps that show areas of the City subject to geologic hazards. The project site is located in an area subject to “strong” ground shaking (structural damage) from earthquakes along the San Andreas Fault (Map 2 of the Community Safety Element) and “moderate” shaking intensity from earthquakes along the Northern Hayward Fault (Map 3). The project site is located approximately 6 miles northwest of the San Andreas Fault and approximately 10 miles west of the northern Hayward Fault. Therefore, it is likely that the site would experience periodic minor or major earthquakes associated with a regional fault. The 2007 Working Group on California Earthquake Probabilities estimates that there is a 63 percent chance that a magnitude 6.7 or greater earthquake will occur in the San Francisco Bay Area within 30 years. Like the entire San Francisco Bay Area, the project site is subject to groundshaking in the event of an earthquake.

⁶¹ Treadwell & Rollo, Preliminary Geotechnical Evaluation dated February 22, 2011. A copy of this letter is available for review at the Planning Department offices at 1650 Mission Street, Suite 400, related to Case No. 2011.0277E.

⁶² Treadwell & Rollo, Geotechnical Investigation Town School for Boys dated March 11, 2011. A copy of this letter is available for review at the Planning Department offices at 1650 Mission Street, Suite 400, related to Case No. 2011.0277E.

⁶³ Liquefaction is a phenomenon in which saturated, cohesionless soil experiences a temporary loss of strength due to the buildup of excess pore water pressure, especially during cyclic loading such as that induced by earthquakes. Soil most susceptible to liquefaction is loose, clean, saturated, uniformly graded, fine-grained sand and silt of low plasticity that is relatively free of clay.

⁶⁴ Lateral spreading is a phenomenon in which surficial soil displaces along a shear zone that has formed within an underlying liquefied layer. Upon reaching mobilization, the surficial blocks are transported downslope or in the direction of a free face by earthquake and gravitational forces.

⁶⁵ Soil compaction, or cyclic densification, is a phenomenon in which non-saturated, cohesionless soil is densified by earthquake vibrations, causing settlement.

Groundshaking associated with an earthquake on one of the regional faults around the project site may result in ground failure, such as that associated with soil liquefaction, lateral spreading, and differential compaction. The project site is not located in an area of liquefaction potential, as shown in the Community Safety Element of the General Plan (Map 4, titled "Hazards Study Zones—Areas of Liquefaction Potential"). Additionally, the project site is not in an area of potential landslide hazards (Map 5).⁶⁶

According to the preliminary geotechnical investigation conducted by Treadwell & Rollo, the site is underlain by one to three feet of sand and silty, clayey sand fill. Beneath this fill, bedrock of the Franciscan Complex formation consisting of deeply to moderately weathered sandstone is expected to be encountered for the extent of the 30 feet of excavation for the proposed project. Additionally, it is anticipated that, during construction of the two-story horizontal addition of the school along Jackson Street, the original slope of bedrock was cut back at a steep angle, the existing retaining wall was constructed and the space between the retaining wall and the cut slope was backfilled with soil; therefore, the thickness of the fill is greatest adjacent to the wall and decreases towards the northeast boundary of the property. Construction of the proposed horizontal additions is expected to encounter fill and bedrock. It is anticipated that the exposed rock at the foundation level for the Core Modernization/Expansion Phase of the project will consist of moderate to deeply to moderately weathered sandstone, which would allow for a foundation with shallow footing to support the proposed addition.⁶⁷ As discussed above, excavation as deep as 30 feet would be required to accommodate the proposed addition and foundation. The excavation would be deeper than the existing structure to the north and west, and match the depth of the existing building foundation of the school to the south and east. During construction of the project use, of temporary shoring along the north and west sides of the excavation to safely develop the property would be necessary. Where the excavation abuts an existing retaining wall, the foundations adjacent to the excavation can be underpinned and the remaining excavation shored or the shoring system can be designed for the entire excavation, built adjacent to the existing wall to support both the retained soil and the wall.

⁶⁶ City and County of San Francisco, Community Safety Element, *General Plan*, April 1997.

⁶⁷ Treadwell & Rollo, March 11, 2011.

The final building plans would be reviewed by the Department of Building Inspection (DBI). In reviewing building plans, DBI refers to a variety of information sources to determine existing hazards and assess requirements for mitigation. Sources reviewed include maps of Special Geologic Study Areas and known landslide areas in San Francisco as well as the building inspectors' working knowledge of areas of special geologic concern. Potential geologic hazards would be addressed during the permit review process through these measures. To ensure compliance with all Building Code provisions regarding structure safety, when DBI reviews the geotechnical report and building plans for a proposed project, they will determine the adequacy of necessary engineering and design features. Past geological and geotechnical investigations would be available for use by DBI during its review of building permits for the site. Also, DBI could require that additional site-specific soils report(s) be prepared in conjunction with permit applications, as needed. Therefore, potential damage to structures from geologic hazards on the project site would be avoided through DBI's requirement for a geotechnical report and review of the building permit application pursuant to DBI implementation of the Building Code, and this impact would be less than significant.

Impact GE-2: The proposed project site would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. (Less than Significant)

As shown on the official State of California Seismic Hazards Zone Map for San Francisco prepared under the Seismic Hazards Mapping Act of 1990,⁶⁸ the project site is within an area subject to landslide (Map 5 of the Community Safety Element). However, as stated above, the final building plans would be reviewed by DBI, and in reviewing building plans, DBI refers to a variety of information sources to determine existing hazards and assess requirements for mitigation. Therefore, potential damage to structures from geologic hazards, such as landslides, on the project site would be avoided through DBI's requirement for a geotechnical report and review of the building permit application pursuant to DBI implementation of the Building Code. Therefore, the proposed project would not result in landslide-related impacts.

⁶⁸ The Seismic Hazards Mapping Act was developed to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and from other hazards caused by earthquakes. This act requires the State Geologist to delineate various seismic hazards zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within these zones.

Impact GE-3: The proposed project would not result in substantial loss of topsoil or erosion. (Less than Significant)

The project site is covered entirely with impervious surfaces and does not contain native top soil. Although 30 feet of excavation for the proposed project would occur for the development of the proposed building, it is anticipated that fill and bedrock would be encountered, and the project would not result in the substantial loss of topsoil. Additionally, compliance with standard erosion-control measures would ensure that the potential for erosion would be less-than-significant.

Impact GE-4: The proposed project would not result in impacts to site topographical features. (Less than Significant)

The topography in the project site slopes towards the northwest, and the rear yards of the neighboring properties are at approximately the same level as the roof of the existing school building. The project would excavate 30 feet below grade for the construction of a portion of the proposed project; however, the project would remain within the existing boundaries of the school and would not significantly change the topographical features of the surrounding area. The proposed project would have less-than-significant impacts with respect to topographical features of the site.

Impact C-GE: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not have a substantial cumulative impact on geology and soils. (Less than Significant)

The proposed project would result in less-than-significant impacts to topographical features, loss of topsoil or erosion, or risk or injury or death involving landslides. Geology impacts are generally site specific and in this setting would not have cumulative effects with other projects. Therefore, the project would not have a considerable contribution to related cumulative impacts. In addition, the building plans of planned and foreseeable projects would be reviewed by the Department of Building Inspection (DBI), and potential geologic hazards would be avoided during the DBI permit review process. Therefore, the cumulative impacts of the project related to geology, soils, and seismicity would be less than significant.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporation</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
15. HYDROLOGY AND WATER QUALITY— Would the project:					
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion of siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Impact HY-1: The proposed project would not violate water quality standards or otherwise substantially degrade water quality. (Less than Significant)

The proposed project would not substantially degrade water quality or contaminate a public water supply. As discussed in Section F.11 Utilities and Service Systems, the project site's wastewater and stormwater would continue to flow into the City's combined stormwater and sewer system and

would be treated to the standards contained in the City's National Pollutant Discharge Elimination System (NPDES) Permit for the Southeast Water Pollution Control Plant, prior to discharge into the Pacific Ocean. Treatment would be provided pursuant to the effluent discharge standards contained in the City's NPDES permit for the plant. During construction, there would be a potential for erosion and the transport of soil particles during site preparation and excavation. Once in surface water runoff, sediment and other pollutants could leave the construction site and ultimately be released into San Francisco Bay. Stormwater runoff from project construction would drain into the combined sewer and stormwater system and be treated at the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. Pursuant to the San Francisco Building Code and the City's NPDES permit, the project sponsor would be required to implement measures to reduce potential erosion impacts. During operation and construction, the proposed project would be required to comply with all local wastewater discharge and water quality requirements. Therefore, the proposed project would not substantially degrade water quality, and impacts on water quality would be less than significant.

Impact HY-2: The proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. (Less than Significant)

Groundwater is not used as a drinking water supply in the City and County of San Francisco. The project site is entirely covered with impervious surfaces. As reported in the geotechnical investigation, groundwater was encountered seeping into the excavation at the soil/bedrock contact at approximately 4 feet below ground surface.⁶⁹ The geotechnical investigation reports that it anticipates that seepage of groundwater from exposed faces of bedrock should be expected during excavation, especially during wet weather conditions. Additionally, groundwater seepage would occur at the bedrock-soil interface and through seams and fractures in the rock and the flow rate should be relatively low.

The project would not result in the use of groundwater, and groundwater anticipated to be encountered during project construction would be low. If any groundwater is encountered during construction of the proposed project, it is subject to the requirements of the City's Industrial Waste Ordinance (Ordinance Number 199 77), requiring that groundwater meet specified water quality

⁶⁹ Treadwell & Rollo, March 11, 2011.

standards before it may be discharged into the sewer system. The Bureau of Systems Planning, Environment, and Compliance of the SFPUC must be notified of projects requiring dewatering, and may require water analysis before discharge. If dewatering is necessary, the final soils report required for the project would address the potential settlement and subsidence associated with the dewatering. The report would contain a determination as to whether or not a lateral movement and settlement survey should be prepared to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring surface is recommended, the Department of Public Works (DPW) would require that a Special Inspector (as defined in Article 3 of the Building Code) be retained by the project sponsor to perform this monitoring. Because the project site would remain entirely impervious after project implementation, the project would not affect groundwater recharge, and this impact would be less than significant.

Impact HY-3: The proposed project would not result in altered drainage patterns that would cause substantial erosion or flooding or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. (Less than Significant)

Compliance with the Stormwater Management Ordinance in general will require the project to maintain or reduce the existing volume and rate of stormwater runoff discharged from the site. To achieve this, the project would implement and install appropriate stormwater management systems that retain runoff onsite, promote stormwater reuse, and limit site discharges before entering the combined sewer collection system. Additionally, because the proposed project would not substantially change the amount of impervious surface area at the site, there would be little change to the quantity and rate of stormwater runoff from the site that flows to the city's combined sewer system. The proposed project would alter drainage on site, but site runoff would continue to drain to the city's combined storm and sanitary sewer system. The foundation and portions of the building below grade would be constructed to be water tight to avoid the need to permanently pump and discharge water. Due to the groundwater seepage at the site, a drainage system under the foundation would connect to the combined sewer systems as a component of the proposed project. Because stormwater flows from the proposed project could be accommodated by the existing combined sewer system, and because there would not be an expected increase in stormwater flows, the proposed project's impact on surface or ground water quality would be less than significant.

Impact HY-4: The proposed project would not expose people, housing, or structures, to substantial risk of loss due to flooding. (Less than Significant)

Flood risk assessment and some flood protection projects are conducted by federal agencies including the Federal Emergency Management Agency (FEMA) and the U.S. Army Corps of Engineers (Corps). The flood management agencies and cities implement the National Flood Insurance Program (NFIP) under the jurisdiction of FEMA and its Flood Insurance Administration. Currently, the City of San Francisco does not participate in the NFIP and no flood maps are published for the City. However, FEMA is preparing Flood Insurance Rate Maps (FIRMs) for the City and County of San Francisco for the first time. FIRMs identify areas that are subject to inundation during a flood having a one percent chance of occurrence in a given year (also known as a "base flood" or "100-year flood"). FEMA refers to the flood plain that is at risk from a flood of this magnitude as a special flood hazard area ("SFHA").

Because FEMA has not previously published a FIRM for the City and County of San Francisco, there are no identified SFHAs within San Francisco's geographic boundaries. FEMA has completed the initial phases of a study of the San Francisco Bay. On September 21, 2007, FEMA issued a preliminary FIRM (PFIRM) of San Francisco for review and comment by the City. The City has submitted comments on the PFIRM to FEMA. FEMA anticipates publishing a revised PFIRM in 2012⁷⁰, upon completion of a more detailed analysis that responds to Port and City staff comments on the 2007 PFIRM. After review of comments and appeals related to the revised preliminary FIRM, FEMA will finalize the FIRM and publish it for flood insurance and floodplain management purposes.

FEMA has tentatively identified SFHAs along the City's shoreline in and along San Francisco Bay consisting of Zone A (areas subject to inundation by tidal surge) and Zone V (areas of coastal flooding subject to wave hazards).⁷¹ On June 10, 2008, legislation was introduced at the San Francisco Board of Supervisors to enact a floodplain management ordinance to govern new

⁷⁰ San Francisco Floodplain Management Program Fact Sheet, Office of the City Administrator, Revised January 25, 2011.

⁷¹ City and County of San Francisco, Office of the City Administrator, National Flood Insurance Program Flood Sheet, <http://sfgsa.org/index.aspx?page=828> . Accessed September 8, 2010.

construction and substantial improvements in flood prone areas of San Francisco, and to authorize the City's participation in NFIP upon passage of the ordinance. Specifically, the proposed floodplain management ordinance includes a requirement that any new construction or substantial improvement of structures in a designated flood zone must meet the flood damage minimization requirements in the ordinance. The NFIP regulations allow a local jurisdiction to issue variances to its floodplain management ordinance under certain narrow circumstances, without jeopardizing the local jurisdiction's eligibility in the NFIP. However, the particular projects that are granted variances by the local jurisdiction may be deemed ineligible for federally-backed flood insurance by FEMA.

Once the Board of Supervisors adopts the Floodplain Management Ordinance, the Department of Public Works will publish flood maps for the City, and applicable City departments and agencies may begin implementation for new construction and substantial improvements in areas shown on the Interim Floodplain Map. According to the preliminary flood map, the project site is not located within a potential flood zone.⁷² Therefore, the project would result in less than significant impacts related to development within a 100-year flood zone.

Impact HY-5: The proposed project would not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow. (No Impact)

As discussed in the section pertaining to geology and soils, above, the project site is not in an area subject to tsunami run-up, or reservoir inundation hazards (Maps 6 and 7 in the General Plan Community Safety Element). Therefore, the project is not expected to expose people or structures to risk from inundation by seiche, tsunami or mudflow.

Impact C-HY: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not have a substantial cumulative impact on hydrology and water quality. (Less than Significant)

Given the discussion above, the proposed project would not have a significant impact on water quality standards, groundwater, drainage, or runoff and thus would not contribute considerably to any cumulative impacts in these areas. Flood and inundation hazards are site-specific; thus, the

⁷² Federal Emergency Management Agency, Preliminary Flood Insurance Rate Map, City and County of San Francisco, California, Panels 92A, 94A, 110A, 111A, 112A, 120A, 130A, 140A, 210A, 235A, and 255A, September 21, 2007, available at <http://sfgsa.org/index.aspx?page=828>, accessed May 25, 2010.

proposed project would not have considerable cumulative impacts. However, other proposed developments in the project area, in combination with the proposed project, could result in intensified uses and a cumulative increase in wastewater generation. The SFPUC, which provides wastewater treatment in the city, has accounted for such growth in its service projections. Thus, the project's contribution to any cumulative impacts on hydrology or water quality would be less-than-significant. In light of the above, effects related to water resources would not be significant, either individually or cumulatively.

<u>Topics:</u>	<u>Potentially Significant Impact</u>	<u>Less Than Significant with Mitigation Incorporated</u>	<u>Less Than Significant Impact</u>	<u>No Impact</u>	<u>Not Applicable</u>
16. HAZARDS AND HAZARDOUS MATERIALS— Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The project site is not within an airport land use plan area, nor is it in the vicinity of a private airstrip; therefore, significance criteria 16e and 16f do not apply to the proposed project.

Impact HZ-1: The proposed project would not create a significant hazard through routine transport, use, disposal, handling or emission of hazardous materials. (Less than Significant)

The project would involve the construction of a two-phased addition to an existing school, and would result in the use of relatively small quantities of hazardous materials for routine purposes. The development would likely handle common types of hazardous materials, such as cleaners and disinfectants. These products are labeled to inform users of potential risks and to instruct them in appropriate handling procedures. Most of these materials are consumed through use, resulting in relatively little waste. Businesses are required by law to ensure employee safety by identifying hazardous materials in the workplace, providing safety information to workers who handle hazardous materials, and adequately training workers. For these reasons, hazardous materials used during project operation would not pose any substantial public health or safety hazards related to hazardous materials. Thus, there would be less-than-significant impacts related to hazardous materials use, with development of the proposed project.

Impact HZ-2: Demolition and excavation of the project site could result in handling and accidental release of contaminated soils and hazardous building materials associated with historic uses. (Less than Significant with Mitigation)

The project site is developed with an existing elementary school. The project site is not on the Hazardous Waste and Substances Sites List, commonly called the "Cortese List," compiled by the California Department of Toxic Substances Control (DTSC) pursuant to Government Code Section 65962.5. The City adopted Ordinance 253-86 (signed by the Mayor on June 27, 1986), which requires analyzing soil for hazardous wastes within specified areas bayward of the historic high tide line, known as the Maher area, when over 50 cubic yards of soil is to be disturbed and on sites specifically designated by the Director of Public Works.⁷³ The project site falls outside the boundary of the Maher Ordinance and, therefore, would not be subject to this ordinance.

⁷³ The Maher Ordinance applies to that portion of the City bayward of the original high tide line, where past industrial uses and fill associated with the 1906 earthquake and bay reclamation often left hazardous waste residue in soils and groundwater. The ordinance requires that soils must be analyzed for hazardous wastes if more than 50 cubic yards of soil are to be disturbed.

The project site is listed on the State Water Resources Control Board Geotracker database as a site with a Leaking Underground Storage Tanks (LUST), which was removed and cleaned up in August 2004.⁷⁴ The previously removed LUST represents a historical recognized environmental condition. This underground heating oil storage tank was located beneath the sidewalk along 2750 Jackson Street frontage of the project site. The tank had a capacity of approximately 1,500 gallons of heating oil and was constructed of steel. The tank was encountered during a subsurface repair of nearby water lines, at which time the tank was disrupted and a small amount of heating oil seeped into the soil surrounding the tank. There had been no previous record of the underground storage tank recorded at the project site. Following the encounter of the LUST, the remains of any hazardous heating oil were removed and transported to a hazardous waste facility, and the tank was excavated and removed. Following the excavation of the tank, soil and water quality samples were taken to determine if the LUST had resulted in contamination of the soils and water on the project site. Analytical results of the sampling and analysis program indicated the soil underlying the tank did contain elevated levels of total petroleum hydrocarbon constituents as diesel and BTEX.⁷⁵ Based on these results, these contaminated soils were removed and transported to a Class II landfill. Based upon these remedial actions, the Department of Public Health, Occupational and Environmental Health Division issued a Remedial Action Completion Certificate to confirm the site investigation and corrective action for the LUST was complete.⁷⁶ The remedial actions determined that that no further action is required for the site and any potential impacts from the encounter of hazardous materials with excavation for the project would be less-than-significant.⁷⁷ However, according to DPH it is not uncommon for previously unknown tanks to be discovered at sites with a long history of development. The encounter of previously unknown underground storage tanks (USTs) during site excavation of the proposed project would result in a potentially significant

⁷⁴ City and County of San Francisco Department of Public Health, Division of Occupational and Environmental Health, letter to Brewster Ely, Headmaster, Town School for Boys, August 23, 2004. This document is on file and available for public review at the Planning Department, 1650 Mission Street, Suite 400, San Francisco, as part of the project file 2011.0277E.

⁷⁵ Golden Gate Tank Removal, Inc., Tank Closure Report, 2750 Jackson Street, San Francisco, CA, February 26, 2004

⁷⁶ County of San Francisco Department of Public Health, Division of Occupational and Environmental Health, Ibid.

⁷⁷ Email between Elyse Heilshorn, San Francisco Department of Public Health, Division of Occupational and Environmental Health, and Chelsea Fordham, San Francisco Planning Department, May 3, 2012.

impact. Implementation of **Mitigation Measure M-HZ-2a**, which is described below would reduce this impact to a less-than-significant level.

Mitigation Measure M-HZ-2a: Removal of Unknown Underground Storage Tank (UST)

Should an underground storage tank (UST), or other item of environmental concern or contamination be encountered, work should be suspended and the owner notified. The site owner/project contractor shall notify the San Francisco Department of Public Health of the situation and of the proposed response actions. A UST shall be removed under permit with the San Francisco Department of Public Health- Hazardous Materials Unified Program Agency (HMUPA) and the San Francisco Fire Department. DPH SAM should be sent a copy of any documents received from or prepared for HMUPA or the Fire Department.

The project site would be developed within the existing boundaries of the Town School for Boys. The proposed two-phased addition could result in the disturbance of building materials that contain hazardous materials.

Asbestos

The existing structure on the project site includes a 54,540 sf existing school that was constructed in phases from 1957 to 1983. Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or asbestos abatement work. The notification must include: (1) the names and addresses of the operations; (2) the names and addresses of persons responsible; and (3) the location and description of the structure to be demolished/altered, including size, age, and prior use, and the approximate amount of friable asbestos; (4) scheduled starting and completion dates of demolition or asbestos abatement work; (5) nature of the planned work and methods to be employed; (6) procedures to be employed to meet BAAQMD requirements; (7) and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects asbestos removal operations. In addition, the BAAQMD will inspect any removal operation about which a complaint has been

received. Any ACBM disturbance at the project site would be subject to the requirements of BAAQMD Regulation 11, Rule 2: Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing.

The local office of the State Occupational Safety and Health Administration must also be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow State regulations contained in 8#CCR#1529 and 8#CCR#341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of asbestos containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material are required to file a Hazardous Waste Manifest that details the hauling of the material from the site and the disposal of it. Pursuant to California Law, the Department of Building Inspection would not issue the required permit until the applicant has complied with the notice requirements described above.

Lead-Based Paint

Lead paint may be found in buildings constructed prior to 1978 and proposed for demolition. Demolition must be conducted in compliance with Section 3423 of the *San Francisco Building Code (Building Code)*, Work Practices for Exterior Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead paint on the exterior of any building, or the interior of occupied buildings (E3, R1, or R3 occupancy classifications) built prior to or on December 31, 1978, Section 3423 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Section 3423 applies to buildings or steel structures on which original construction was completed prior to 1979, which are assumed to have lead-based paint on their surfaces unless a certified lead inspector/assessor tests surfaces for lead and determines it is not present according to the definitions of Section 3423. The ordinance contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in HUD Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to the ordinance shall make all

reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

The Ordinance also includes notification requirements, contents of notice, and requirements for project site signs. Prior to commencement of exterior work that disturbs or removes 100 or more square feet or 100 or more linear feet of lead-based paint in total, the responsible party must provide the Director of DBI with written notice that describes the address and location of the proposed project; the scope and specific location of the work; whether the responsible party has reason to know or presume that lead-based paint is present; the methods and tools for paint disturbance and/or removal; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential; whether it is owner-occupied or rental property; the approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. Further notice requirements include: a Post Sign notifying the public of restricted access to work area, a Notice to Residential Occupants, Availability of Pamphlet related to protection from lead in the home, and Early Commencement of Work (by Owner, Requested by Tenant), and Notice of Lead Contaminated Dust or Soil, if applicable. The ordinance contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

These regulations and procedures, already established as part of the building permit review process and the City and State regulatory schemes, would ensure that potential impacts of the proposed project due to the presence of lead-based paint would be reduced to a less-than-significant level.

Other Potential Hazardous Building Materials

In addition to asbestos-containing building materials and lead-based paint, the existing buildings on the site may contain other potentially hazardous building materials such as polychlorinated biphenyl (PCB), contained primarily in exterior paint, sealants, electrical equipment, and fluorescent light fixtures. Fluorescent light bulbs are also regulated (for their disposal) due to their

mercury content. Inadvertent release of such materials during demolition could expose construction workers, occupants, or visitors to these substances and could result in various adverse health effects if exposure were of sufficient quantity. Although abatement or notification programs described above for asbestos and lead-based paint have not been adopted for PCB, mercury, other lead-containing materials, or other possible hazardous materials, items containing these substances that are intended for disposal must be managed as hazardous waste and handled in accordance with Occupational Safety and Health Administration (OSHA) worker protection requirements. Potential impacts associated with encountering hazardous building materials such as PCB, mercury, and lead would be considered a potentially significant impact. Hazardous building materials sampling and abatement pursuant to existing regulations prior to renovation work, as described in **Mitigation Measure M-HZ-2b**, below, would reduce potential impacts associated with PCB, mercury, lead, and other toxic building substances in structures to a less-than-significant level. With **Mitigation Measure M-HZ-2b** implemented, the proposed demolition and excavation for the proposed project would not have the potential to pose a direct (through material removal, if required) or indirect (through transport of materials or accidental release) public health hazard to the surrounding neighborhood. Compliance with existing regulatory requirements, and permits would ensure that the proposed projects do not result in significant effects due to hazardous materials or wastes. Therefore, there would be less-than-significant impacts related to hazardous materials use.

Mitigation Measure M-HZ-2b: Other Hazardous Building Materials

The project sponsor shall ensure that building surveys for PCB- and mercury-containing equipment (including elevator equipment), hydraulic oils, and fluorescent lights are performed prior to the start of renovation. Any hazardous materials so discovered shall be abated according to federal, State, and local laws and regulations.

Impact HZ-3: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. (Less than Significant)

The proposed project could add to congested traffic conditions in the immediate area in the event of an emergency evacuation during the construction period. However, the proposed project would be relatively insignificant within the dense urban setting of the project site and it is expected that

traffic would be dispersed within the existing street grid such that there would be no significant adverse effects on nearby traffic conditions. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and this impact would be less than significant.

Impact HZ-4: The proposed project would not expose people or structures to a significant risk of loss, injury or death involving fires. (Less than Significant)

San Francisco ensures fire safety and emergency accessibility within new and existing developments through provisions of its Building and Fire Codes. The Town School for Boys would conform to these standards, and currently has an emergency procedure manual and an exit drill plan for the existing school, and the proposed addition would conform with these requirements as well. Potential fire hazards (including those associated with hydrant water pressure and blocking of emergency access points) would be addressed during the permit review process. Conformance with these standards would ensure appropriate life safety protections. Consequently, the project would not have a significant impact on fire hazards nor interfere with emergency access plans.

Impact C-HZ: The proposed project, in combination with past, present, and reasonably foreseeable future projects in the site vicinity, would not have a substantial cumulative impact with hazards and hazardous materials. (Less than Significant)

Impacts from hazards are generally site-specific, and typically do not result in cumulative impacts. Any hazards present at surrounding sites would be subject to the same safety requirements discussed for the proposed project above, which would reduce any cumulative hazard effects to levels considered less than significant. Overall, with implementation of Mitigation Measures M-HZ-2a to M-HZ-2b described above, the proposed project would not contribute considerably to significant cumulative effects related to hazards and hazardous materials.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
17. MINERAL AND ENERGY RESOURCES— Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

All land in San Francisco, including the project site, is designated Mineral Resource Zone 4 (MRZ-4) by the California Division of Mines and Geology (CDMG) under the Surface Mining and Reclamation Act of 1975 (CDMG, Open File Report 96-03 and Special Report 146 Parts I and IT). This designation indicates that there is inadequate information available for assignment to any other MRZ and thus the site is not a designated area of significant mineral deposits. Since the project site is already developed, future evaluation or designation of the site would not affect or be affected by the proposed project. There are no operational mineral resource recovery sites in the project area whose operations or accessibility would be affected by the construction or operation of the proposed project. Accordingly, this topic is not applicable to the proposed project.

Impact ME-1: Implementation of the proposed project would not encourage activities which would result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner. (Less than Significant)

Development of the proposed project would not result in the consumption of large amounts of fuel, water, or energy. The generation of electricity to serve the proposed project would consume natural gas and coal fuel. The proposed project would meet or exceed current State and local codes regarding energy consumption, including Title 24 of the California Code of Regulation enforced by the DBI. They would not use fuel or water in an atypical or wasteful manner.

Based on the above information, the proposed project would not result in a less-than-significant impact on mineral or energy resources.

Impact C-ME: The proposed project, in combination with the past, present, and reasonably foreseeable future projects in the site vicinity, would result in a less-than-significant cumulative impacts to energy and minerals. (Less than Significant)

As described above, no known minerals exist at the project site, and therefore the project would not contribute to any cumulative impact on mineral resources. The project-generated demand for electricity would be negligible in the context of overall demand within San Francisco and the State,

and would not in and of itself require a major expansion of power facilities. Therefore, the energy demand associated with the project would result in a less-than-significant physical environmental effect. The proposed project would not contribute to cumulatively considerable impacts related to energy and natural resources. Overall, the project would not result in cumulatively considerable impacts related to mineral and energy resources.

<i>Topics:</i>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
18. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.					
—Would the project					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined by Public Resources Code Section 4526)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Impact AF-1: The proposed project would not result in the conversion of farmland or forest lands to non-farm or non-forest use, nor would it conflict with existing agricultural or forest use or zoning. (Not Applicable)

The project site is located within an urban area in the City and County of San Francisco. The California Department of Conservation's Farmland Mapping and Monitoring Program identifies the site as Urban and Built-Up Land, which is defined as "... land [that] is used for residential, industrial, commercial, institutional, public administrative purposes, railroad and other

transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes." Because the project site does not contain agricultural uses and is not zoned for such uses, the proposed project would not convert any prime farmland, unique farmland or Farmland of Statewide Importance to non-agricultural use, and it would not conflict with existing zoning for agricultural land use or a Williamson contract, nor would it involve any changes to the environment that could result in the conversion of farmland or conversion of forest land to non-forest use. Therefore, the proposed project would have no impacts to agricultural resources.

<u>Topics:</u>	<i>Potentially Significant Impact</i>	<i>Less Than Significant with Mitigation Incorporation</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>	<i>Not Applicable</i>
19. MANDATORY FINDINGS OF SIGNIFICANCE— Would the project:					
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The foregoing analysis identifies potentially significant impacts to archeological resources, air quality, and hazards and hazardous materials, which would all be mitigated through implementation of mitigation measures as described below and more fully within Section F, below.

a. As discussed in Topic E.4, it is possible that below-ground archeological resources may be present. Any potential adverse effect to CEQA-significant archeological resources resulting from soils disturbance from the proposed project would be reduced to a less-than-significant level by implementation of Mitigation Measure M-CP-2, described within Section F of this Initial Study.

Accordingly, the proposed project would not result in a significant impact to archeological resources through the elimination of examples of major periods of California history or prehistory.

b. The proposed project in combination with the 2727 Pacific Avenue, 2555 Divisadero Street, and 2712 Broadway projects would not result in cumulative impacts to land use, aesthetics, population and housing, cultural resources, transportation, noise, air quality, greenhouse gas emissions, wind and shadow, recreation, utilities, public services, biological resources, geology, hydrology, hazardous materials, mineral resources, and agricultural resources. The proposed project's contributions to cumulative traffic at intersections in the vicinity would not be substantial. The proposed project would not be considered to contribute incrementally to cumulative regional air quality conditions, or to contribute to significant cumulative noise impacts. The proposed project would be consistent with the land use and height controls for the site and would not contribute to a cumulatively considerable land use or visual impact. No other significant cumulative impacts are anticipated. In summary, the proposed project would not have unavoidable environmental effects that are cumulatively considerable.

c. The proposed project, as discussed in Section C (Compatibility with Existing Zoning and Plans) and Topic E.1 (Land Use and Land Use Planning), would be generally consistent with local land use and zoning requirements. Mitigation Measure M-AQ-5, described within Section F, has been incorporated into the proposed project to address potential exposure of sensitive receptors to substantial pollutant concentrations in order to reduce this impact to a less-than-significant level. Mitigation Measures M-HZ-2(a) to M-HZ-2(b), described within Section F, have been incorporated into the proposed project to address potential hazards and hazardous materials effects in order to reduce these impacts to a less-than-significant level. Additionally, Mitigation Measure M-NO-2 has been incorporated to address the impacts from construction noise and vibration to adjacent residents in order to reduce these impacts to a less-than-significant level.

F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

Mitigation Measures

The following mitigation measures have been adopted by the project sponsor and are necessary to avoid potential significant effects of the proposed project.

Mitigation Measure M-CP-2: Archeology (Accidental Discovery)

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in CEQA Guidelines Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

If the ERO in consultation with the California State Lands Commission (CSLC) determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archeological consultant. The archeological consultant shall advise the ERO and the CSLC as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted.

Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the requirements of the ERO and the CSLC. Any required archeological investigation or data recovery plan shall conform to the requirements of State law for a salvage/excavation permit involving a submerged archeological site (Pub. Res. Code §. 6313 (d), (e), and (f)). The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO and CSLC that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Copies of the Draft FARR shall be sent to the ERO and the CSLC for review and approval. Once approved by the ERO and the CSLC, copies of the FARR shall be distributed as follows: California Archeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department and the CSLC shall receive two copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO and the CSLC may require a different final report content, format, and distribution than that presented above.

Mitigation Measure M-AQ-5: Construction Emissions Minimization Plan

- A. *Construction Emissions Minimization Plan.* Prior to issuance of a construction permit, the project sponsor shall submit a Construction Emissions Minimization Plan (Plan) for the Core Modernization and Expansion Phase to the Environmental Review Officer (ERO) for review and approval by an Environmental Planning Air Quality Specialist. The Plan shall detail project compliance with the following requirements:

1. Off-road equipment such as cranes, excavators, backhoes, and off-road trucks utilized during the Core Modernization and Expansion Phase trucks shall meet the following requirements:
 - a) All off-road equipment shall have:
 - i. Engines that meet or exceed either USEPA or ARB Tier 2 off-road emission standards, *and*
 - ii. Engines that are retrofitted with an ARB Level 2 Verified Diesel Emissions Control Strategy (VDECS).⁷⁸
2. The project sponsor shall require the idling time for off-road equipment to be limited to no more than *two* minutes, except as provided in exceptions to the applicable state regulations regarding idling for off-road equipment. Legible and visible signs shall be posted in multiple languages (English, Spanish, Chinese) in designated queuing areas and at the construction site to remind operators of the two minute idling limit.
3. The project sponsor shall require that construction operators properly maintain and tune equipment in accordance with manufacturer specifications.
4. The Plan shall include estimates of the construction timeline by phase with a description of all such cranes, excavators, backhoes, and off-road trucks required for the Core Modernization and Expansion Phase. Off-road equipment descriptions and information may include, but is not limited to: equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For VDECS installed: technology type, serial number, make, model, manufacturer, ARB verification number level, and installation date and hour meter reading on installation date.
5. The Plan shall be kept on-site and available for review by any persons requesting it and a legible sign shall be posted at the perimeter of the construction site indicating to the public the basic requirements of the Plan and a way to request a copy of the Plan. The project sponsor shall provide copies of Plan to members of the public as requested.

B. *Reporting.* Monthly reports shall be submitted to the ERO indicating the construction phase and off-road equipment information used during each phase including the information

⁷⁸ Equipment with engines meeting Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement, therefore a VDECS would not be required.

required in subsection A(4) above. In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

Within six months of the completion of construction activities, the project sponsor shall submit to the ERO a final report summarizing construction activities. The final report shall indicate the start and end dates and duration of each construction phase. For each phase, the report shall include detailed information required in A(4). In addition, for off-road equipment using alternative fuels, reporting shall include the actual amount of alternative fuel used.

- C. *Certification Statement and On-site Requirements.* Prior to the commencement of construction activities, the project sponsor must certify (1) compliance with the Plan, and (2) all applicable requirements of the Plan have been incorporated into contract specifications.

Mitigation Measure M-NO-2: Reduction of Construction Noise

The following measures would further minimize construction noise impacts on sensitive receptors:

- Construction equipment shall be properly maintained in accordance with manufacturers' specifications and shall be fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All impact tools shall be shrouded or shielded, and all intake and exhaust ports on power equipment shall be muffled or shielded.
- Construction equipment shall not idle for extended periods of time near noise-sensitive receptors.
- Stationary equipment (compressors, generators, and cement mixers) shall be located as far from sensitive receptors as feasible. Sound enclosures shall be used during noisy operations on-site.
- Temporary barriers (noise blankets or wood paneling) shall be placed around the construction site parcels and, to the extent feasible, they should break the line of sight from noise sensitive receptors to construction activities. For temporary sound blankets, the material shall be weather and abuse resistant, and shall exhibit superior hanging and tear strength with a surface weight of at least 1 pound per square foot. Placement, orientation, size, and density of acoustical barriers shall be reviewed and approved by a qualified acoustical consultant.

- When temporary barrier units are joined together, the mating surfaces shall be flush with each other. Gaps between barrier units, and between the bottom edge of the barrier panels and the ground, shall be closed with material that would completely close the gaps, and would be dense enough to attenuate noise.

Mitigation Measure M-HZ-2a: Removal of Unknown Underground Storage Tank (UST)

Should an underground storage tank (UST), or other item of environmental concern or contamination be encountered, work should be suspended and the owner notified. The site owner/project contractor shall notify the San Francisco Department of Public Health of the situation and of the proposed response actions. A UST shall be removed under permit with the San Francisco Department of Public Health- Hazardous Materials Unified Program Agency (HMUPA) and the San Francisco Fire Department. DPH SAM should be sent a copy of any documents received from or prepared for HMUPA or the Fire Department.

Mitigation Measure M-HZ-2b: Other Hazardous Building Materials

The project sponsor shall ensure that building surveys for PCB- and mercury-containing equipment (including elevator equipment), hydraulic oils, and fluorescent lights are performed prior to the start of renovation. Any hazardous materials so discovered shall be abated according to federal, State, and local laws and regulations.

G. PUBLIC NOTICE AND COMMENT

A "Notification of Project Receiving Environmental Review" was mailed on March 14, 2012, to the owners of properties within 300 feet of the project site and to neighborhood groups. Overall, concerns and issues raised by the public in response to the notice were taken into consideration and incorporated into the Initial Study as appropriate for CEQA analysis. Members of the public expressed concerns regarding the possibility of increases in the student body associated with the proposed project, construction noise, construction pollution, traffic impacts from construction and operation, and aesthetics impacts. Discussions related to these issues have been included in the appropriate sections of the Initial Study above. With the implementation of mitigation measures

for air quality and noise, the proposed project would not result in significant adverse environmental impacts associated with those issues identified by the public. There is no substantial evidence that any of these topics could have a significant effect on the environment.


Other comments by members of the public in response to the public notice expressed either support for or opposition to the proposed project. Comments regarding the merits of the project are not relevant to CEQA analysis but may be taken into account by decision-makers as part of the project approval process. While local concerns or other planning considerations may be grounds for modification or denial of the proposal, in the independent judgment of the Planning Department, no significant, unmitigable impacts have been identified.

H. DETERMINATION

On the basis of this Initial Study:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

DATE August 2, 2012


Bill Wycko
Environmental Review Officer
for John Rahaim, Director of Planning

I. NEGATIVE DECLARATION PREPARERS

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